

Exhibit 31

DAWN H. CURTIS
Smartmatic USA Corp. vs Michael J. Lindell

September 12, 2023

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Page 1	Page 3
<p>1 IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MINNESOTA</p> <p>2 -----</p> <p>3 SMARTMATIC USA CORP., SMARTMATIC INTERNATIONAL 4 HOLDING B.V., AND SGO CORPORATION LIMITED,</p> <p>5</p> <p>6 Plaintiffs, 7 vs. Case No. 22-cv-0098-WMW-JFD 8 MICHAEL J. LINDELL and MY PILLOW, INC.,</p> <p>9</p> <p>10 Defendants.</p> <p>11 -----</p> <p>12</p> <p>13</p> <p>14 Video Deposition of 15 DAWN H. CURTIS 16 Tuesday, September 12, 2023</p> <p>17 8:57 a.m.</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>Reporter: Barbara J. Carey, RPR 25 Job Number: J10261228</p>	<p>1 I N D E X</p> <p>2 EXAMINATION OF DAWN H. CURTIS: 3 By Ms. Wrigley - Page 12 By Ms. Oliver - Page 345</p> <p>4</p> <p>5 EXHIBITS MARKED:</p> <p>6 Number Description Page</p> <p>7 Exh. 405 45 Printout from MyPillow Website (7 pages)</p> <p>8</p> <p>9 Exh. 406 52 Printout from MyPillow Website (41 pages)</p> <p>10</p> <p>11 Exh. 407 58 Printout from MyPillow Website (24 pages)</p> <p>12</p> <p>13 Exh. 408CONFIDENTIAL/AEO..... 90 P&L Statement</p> <p>14 Bates DEF030740.000001, et al.</p> <p>15</p> <p>16 Exh. 409CONFIDENTIAL/AEO..... 96 MyPillow, Inc., Sales By Customer Summary</p> <p>17 Bates DEF030750.000001, et al.</p> <p>18 Exh. 410 99 Text Messages</p> <p>19 Bates DEF080781.000001, et al.</p> <p>20 Exh. 411 133 Video of the Absolute Proof Documentary</p> <p>21</p> <p>22 Exh. 412 142 2/5/21 Email String Re: Quick Question - Mike's Video - May I Announce on air?</p> <p>23</p> <p>24 (Continued...)</p> <p>25</p>
<p>1 APPEARANCES:</p> <p>2</p> <p>3 ATTORNEY FOR PLAINTIFF SMARTMATIC USA CORP., SMARTMATIC INTERNATIONAL HOLDING B.V., AND SGO CORPORATION LIMITED:</p> <p>4</p> <p>5 Julie M. Loftus, Esq. Nicole E. Wrigley, Esq. BENESCH, FRIEDLANDER, COPLAN & ARONOFF LLP 6 71 South Wacker Drive, Suite 1600 Chicago, IL 60606 7 Telephone: (312) 212-4949 nwigley@beneschlaw.com 8 jloftus@beneschlaw.com</p> <p>9</p> <p>10 ATTORNEY FOR DEFENDANT MICHAEL J. LINDELL AND MYPILLOW, INC.</p> <p>11 Amanda K. Oliver, Esq. PARKER DANIELS KIBORT 12 888 Colwell Building 123 North Third Street 13 Minneapolis, Minnesota 55401 Telephone: (612) 355-4100 14 oliver@parkerdk.com</p> <p>15</p> <p>16 ALSO PRESENT:</p> <p>17 Robert Buchman, Videographer</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p>1 I N D E X (Continued):</p> <p>2</p> <p>3 EXHIBITS:</p> <p>4 NUMBER/DESCRIPTION PAGE</p> <p>5 Exh. 413 146 2/5/21 Email String Re: Vimeo Absolute Proof 2hr Documentary Bates DEF022482.000001</p> <p>6</p> <p>7 Exh. 414 149 2/5/21 Email String Re: Mike's Documentary on Election Fraud Bates DEF016737, et al.</p> <p>8</p> <p>9 Exh. 415 151 2/5/21 Email String Re: Mike's Documentary on Election Fraud Bates DEF019495.000001</p> <p>10</p> <p>11 Exh. 416 154 2/5/21 Email String Re: Mike's Documentary on Election Fraud Bates DEF068429.000001, et al.</p> <p>12</p> <p>13 Exh. 417 157 2/5/21 Email String Re: Mike's Documentary on Election Fraud Bates DEF025299.000001</p> <p>14</p> <p>15 Exh. 418 159 2/5/21 Email String Re: Mike Lindell Absolute Proof Documentary Bates DEF018146.000001, et al.</p> <p>16</p> <p>17 Exh. 419 161 2/5/21 Email String Re: Mike's Documentary on Election Fraud Bates DEF022390.000001</p> <p>18</p> <p>19 Exh. 420 162 2/5/21 Email String Re: Mike's Documentary on Election Fraud Bates DEF016635.000001</p> <p>20</p> <p>21 (Continued...)</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>

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1	I N D E X (Continued):	1	I N D E X (Continued):
2		2	
3	EXHIBITS:	3	EXHIBITS:
4	NUMBER/DESCRIPTION PAGE	4	NUMBER/DESCRIPTION PAGE
5	Exh. 421 163	5	Exh. 437 214
6	2/5/21 Email String Re: Mike's		Text Messages
	Documentary on Election Fraud	6	Bates DEF034384.000001, et al.
	Bates DEF018055.000001	7	Exh. 438 231
7	Exh. 422 164		Exhibit 17 to Supplemental Complaint -
8	2/5/21 Email String Re: Mike's	8	Screenshots Taken from podcast on the
	Documentary on Election Fraud		Pete Santilli Show
	Bates DEF016634.000001	9	
9	Exh. 423 165	Exh. 439 233	
10	2/5/21 Email String Re: Mike's	10	Video from Mr. Lindell's Appearance
	Documentary on Election Fraud		On the Pete Santilli Show
	Bates DEF025203.000001	11	
12	Exh. 424 166	Exh. 440 236	
13	2/5/21 Email String Re: Mike's	12	Screenshot of What Appeared on
	Documentary on Election Fraud		Video from the Pete Santilli Show
	Bates DEF020883.000001	13	
14	Exh. 425 168	Exh. 441 241	
15	2/5/21 Email String Re: Mike's	14	Video from Appearance of Mr. Lindell
	Documentary on Election Fraud		On Steve Bannon's War Room
	Bates DEF025202.000001	15	
16	Exh. 426 169	Exh. 442 248	
17	2/5/21 Email String Re: Mike's	16	Video from the Eric Metaxas
	Documentary on Election Fraud		Radio Show
	Bates DEF019435.000001	17	
18	Exh. 427 170	Exh. 443 255	
19	2/5/21 Email String Re: Mike's	18	3/31/21 Email String Re: Press Release
	Documentary on Election Fraud		Bates DEF014307.000001, et al.
	Bates DEF015184.000001	19	
20	Exh. 428 171	Exh. 444 n/m	
21	2/5/21 Email String Re: Mike's	20	(Not marked)
	Documentary on Election Fraud	21	Exh. 445 257
	Bates DEF016633.000001		3/31/21 Email String Re: Link to
22		22	Provide Our Affiliates
23			Bates DEF030240.000001, et al.
24		23	
25	(Continued...)		(Continued...)
		24	
		25	
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1	I N D E X (Continued):	1	I N D E X (Continued):
2		2	
3	EXHIBITS:	3	EXHIBITS:
4	NUMBER/DESCRIPTION PAGE	4	NUMBER/DESCRIPTION PAGE
5	Exh. 429 174	5	Exh. 446 262
6	2/16/21 Email String Re: This is the		Exhibit 23 Attached to the
	Corrected One:)	6	Supplemental Complaint: Screenshots
	Bates DEF015551.000001, et al.		Taken of podcast Indivisible with
7	Exh. 430 179	7	John Stubbins
8	2/17/21 Email String Re: Press Release	8	Exh. 447 264
	Bates DEF006165.000001, et al.		Portions of Video from podcast
9	Exh. 431 181	9	USA Watchdog
10	2/17/21 Email String Re: Mike's New	10	Exh. 448 269
	Video Bates		4/12/21 Email String Re: Lindell
	DEF078399.000001, et al.	11	Interview
11	Exh. 432 186		Bates DEF020399.000001
	2/5/21 Appearance of Mike Lindell on	12	Exh. 449 274
	Steve Bannon's War Room Podcast	13	4/16/21 Email String Re: List of
12	Exh. 433 196		Influencers
	2/6/21 Audio of Steve Bannon's	14	Bates DEF018412.000001, et al.
	War Room Podcast	15	Exh. 450 282
13	Exh. 434 203		Exhibit 6 to the Supplemental
	Defendant My Pillow, Inc.'s	16	Complaint: Screenshots of Portions of
	Supplemental Answers and Objections		Video of Absolute Interference
	To Plaintiffs' Second Set of	17	
	Interrogatories	Exh. 451 292	
14	Exh. 435 208	18	4/21/21 Email String Re:
	2/8/21 Video from Real America with		STATS/BACKGROUND FYI (If you need it)
	Dan Ball on OAN with Appearance by	19	Bates DEF017531.000001, et al.
	Mike Lindell	20	Exh. 452 297
15	Exh. 436 211		Exhibit 8 Attached to Supplemental
	2/11/21 Screenshots of Screening and	21	Complaint: Screenshots from Video of
	Appearance of Mike Lindell with		Absolute 9-0
	Steve Bannon related to Absolute Proof	22	Exh. 453 298
16	(Continued...)	23	6/3/21 Email String Re: Mike Lindell
17			Presents: Absolutely 9-0 -
18			Frank Speech of Home of Free Speech
19		24	(Continued...)
20		25	
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<p>1 I N D E X (Continued):</p> <p>2</p> <p>3 EXHIBITS:</p> <p>4 NUMBER/DESCRIPTION PAGE</p> <p>5 Exh. 454 303</p> <p>6 Exhibit 33 Attached to Supplemental</p> <p>7 Complaint: Screenshots Taken from</p> <p>8 Video of Cyber Symposium</p> <p>9 Exh. 455 304</p> <p>10 Screenshot of MyPillow "Flash Sale"</p> <p>11 Bates DEF034440.000001</p> <p>12 Exh. 456 308</p> <p>13 Text Messages</p> <p>14 Bates DEF121015.000001, et al.</p> <p>15 Exh. 457 309</p> <p>16 Video of Mike Lindell</p> <p>17 Exh. 458 311</p> <p>18 Screenshots of Cyber Symposium</p> <p>19 Exh. 459 321</p> <p>20 8/5/21 Email String Re:</p> <p>21 Cyber Symposium Billboard Art</p> <p>22 Bates DEF121959.000001, et al.</p> <p>23 Exh. 460 326</p> <p>24 8/3/21 Email String Re: Move Fox Ad \$</p> <p>25 To 120 Christian News Talk Bott Radio</p> <p>Network Stations</p> <p>Bates DEF023583.000001, et al.</p> <p>Exh. 461 327</p> <p>8/20/21 Email String Re: Many Thanks</p> <p>For All That You Are Doing to Fight</p> <p>For Election Integrity!</p> <p>Bates DEF024937.000001, et al.</p> <p>Exh. 462 334</p> <p>Screenshots Taken from iSpot Website</p> <p>(Continued...)</p>	<p>1 VIDEO DEPOSITION Of DAWN H. CURTIS, held</p> <p>2 at Parker Daniels Kibort LLC, 888 Colwell Building 123 -</p> <p>3 North Third Street, Minneapolis, Minnesota 55401.</p> <p>4 * * * * *</p> <p>5 WHEREUPON, the following proceedings</p> <p>6 were duly had:</p> <p>7 THE VIDEOGRAPHER: We are on the record.</p> <p>8 This is the videotaped deposition of Dawn H. Curtis being</p> <p>9 taken on September 12, 2023. The time is now</p> <p>10 approximately 8:57 a.m.</p> <p>11 The deposition is being taken in the matter of</p> <p>12 Smartmatic USA Corp., et al. vs. Michael J. Lindell,</p> <p>13 et al., filed in the United States District Court for the</p> <p>14 District of Minnesota, Case Number 22-CV-0098-WMW-JFD.</p> <p>15 The deposition is taking place in Minneapolis,</p> <p>16 Minnesota. My name is Robert Buchman. I am the</p> <p>17 videographer representing Esquire Deposition Solutions.</p> <p>18 Will counsel please state their appearance for</p> <p>19 the record?</p> <p>20 MS. WRIGLEY: Nicole Wrigley on behalf</p> <p>21 of the Smartmatic plaintiffs.</p> <p>22 MS. LOFTUS: Julie Loftus, also on</p> <p>23 behalf of the Smartmatic plaintiffs.</p> <p>24 MS. OLIVER: Amanda Oliver on behalf of</p> <p>25 the defendants.</p>
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<p>1 I N D E X (Continued):</p> <p>2</p> <p>3 EXHIBITS:</p> <p>4 NUMBER/DESCRIPTION PAGE</p> <p>5 Exh. 463 334</p> <p>6 Screenshots Taken from iSpot Website</p> <p>7 Exh. 464 336</p> <p>8 Video of Frank Speech TV Spot</p> <p>9 Cyber Symposium</p> <p>10 Exh. 465 336</p> <p>11 Video of Commercial Available Via</p> <p>12 iSpot TV</p> <p>13 Exh. 466 337</p> <p>14 Chart on Magento</p> <p>15 Bates DEF121031.000001, et al.</p> <p>16 Exh. 467 340</p> <p>17 Chart on Magento</p> <p>18 Bates DEF121016.000001, et al.</p> <p>19 PREVIOUSLY MARKED EXHIBITS:</p> <p>20 Number Description Page</p> <p>21 Exh. 47 137</p> <p>22 Exh. 54 322</p> <p>23 Exh. 59 280</p> <p>24 Exh. 60 273</p> <p>25 Exh. 100 167</p> <p>Exh. 102 313</p> <p>*****</p>	<p>1 THE VIDEOGRAPHER: Will the</p> <p>2 court reporter please swear in the witness.</p> <p>3 THE REPORTER: Raise your right hand.</p> <p>4 DAWN H. CURTIS,</p> <p>5 After having been first duly sworn, was called as a</p> <p>6 witness and testified as follows:</p> <p>7 THE REPORTER: Thank you.</p> <p>8 You may begin.</p> <p>9 EXAMINATION</p> <p>10 BY MS. WRIGLEY:</p> <p>11 Q. Good morning.</p> <p>12 A. Good morning.</p> <p>13 Q. Please state and spell your name for the</p> <p>14 record.</p> <p>15 A. Dawn Curtis, D-A-W-N, C-U-R-T-I-S.</p> <p>16 Q. Thank you for being with us today, Ms. Curtis.</p> <p>17 My name is Nicole Wrigley.</p> <p>18 Do you understand that I represent the</p> <p>19 Smartmatic plaintiffs in this matter?</p> <p>20 A. Yes.</p> <p>21 Q. Where do you live, Ms. Curtis?</p> <p>22 A. Victoria, Minnesota.</p> <p>23 Q. What is your home address?</p> <p>24 A. 1776 Stieger Lake Lane, Victoria, Minnesota,</p> <p>25 55386.</p>

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<p style="text-align: right;">Page 13</p> <p>1 Q. Do you have a work address?</p> <p>2 A. 1550 Audubon Road, Chaska, Minnesota, 55318.</p> <p>3 Q. Is that address the headquarters of MyPillow?</p> <p>4 A. Yes.</p> <p>5 Q. Are you currently an employee of MyPillow?</p> <p>6 A. Yes.</p> <p>7 Q. What is your position at MyPillow?</p> <p>8 A. VP of media relations.</p> <p>9 Q. Do you understand that my client, the</p> <p>10 plaintiffs in this matter, have filed a lawsuit against</p> <p>11 Mike Lindell and your employer, MyPillow?</p> <p>12 A. Yes.</p> <p>13 Q. Do you understand that you're here today</p> <p>14 testifying as an employee of MyPillow?</p> <p>15 A. Yes.</p> <p>16 Q. Do you understand that you're providing</p> <p>17 testimony today under oath?</p> <p>18 A. Yes.</p> <p>19 Q. Do you understand that you have to tell the</p> <p>20 truth no matter what?</p> <p>21 A. Yes.</p> <p>22 Q. Do you understand your testimony is being</p> <p>23 recorded by a court reporter?</p> <p>24 A. Yes.</p> <p>25 Q. Do you understand your testimony is being</p>	<p style="text-align: right;">Page 15</p> <p>1 A. Yes.</p> <p>2 Q. In connection with your job at MyPillow during</p> <p>3 the period of time of 2020 through the present, did you</p> <p>4 have marketing responsibilities at MyPillow?</p> <p>5 A. Yes.</p> <p>6 Q. Now, before we get started with some</p> <p>7 additional questions, I want to go over some rules and</p> <p>8 protocols on the record.</p> <p>9 In order for the transcript to be accurate, I</p> <p>10 would ask that you allow me to finish my question before</p> <p>11 you begin answering, and that way, we can avoid talking</p> <p>12 over each other, and she can get an accurate record of</p> <p>13 today.</p> <p>14 Is that fair?</p> <p>15 A. Fair.</p> <p>16 Q. Okay. And do you understand that all your</p> <p>17 answers today need to be oral or verbal as opposed to</p> <p>18 nodding or shaking your head?</p> <p>19 A. Correct.</p> <p>20 Q. Okay. During my examination, there may come a</p> <p>21 point in time where your counsel objects to one of my</p> <p>22 questions.</p> <p>23 Do you understand that you're required to</p> <p>24 answer my question even after counsel objects, unless she</p> <p>25 instructs you otherwise?</p>
<p style="text-align: right;">Page 14</p> <p>1 videotaped?</p> <p>2 A. Yes.</p> <p>3 Q. Do you understand your testimony can be shown</p> <p>4 to the Jury in this case?</p> <p>5 A. Yes.</p> <p>6 Q. Do you know of any reason that would prevent</p> <p>7 you from providing accurate and truthful testimony today?</p> <p>8 A. No.</p> <p>9 Q. Were you an employee of MyPillow in the year</p> <p>10 2020?</p> <p>11 A. Yes.</p> <p>12 Q. Were you an employee of MyPillow in the year</p> <p>13 2021?</p> <p>14 A. Yes.</p> <p>15 Q. Were you an employee of MyPillow in the year</p> <p>16 2022?</p> <p>17 A. Yes.</p> <p>18 Q. And you remain an employee of MyPillow today?</p> <p>19 A. Yes.</p> <p>20 Q. Is it fair to say that you've worked as an</p> <p>21 employee of MyPillow since the 2020 presidential election</p> <p>22 up through the present?</p> <p>23 A. Yes.</p> <p>24 Q. In your current job at MyPillow, do you have</p> <p>25 any marketing responsibilities at MyPillow?</p>	<p style="text-align: right;">Page 16</p> <p>1 A. Yes.</p> <p>2 Q. If I ask you a question and you don't</p> <p>3 understand it, just let me know, and I'll try to rephrase</p> <p>4 it so that we can make sure that you understand what I'm</p> <p>5 asking you today.</p> <p>6 A. Okay.</p> <p>7 Q. And then, if I do ask a question and you</p> <p>8 answer it, I'm going to assume that you understood it and</p> <p>9 answered to the best of your ability.</p> <p>10 Is that fair?</p> <p>11 A. That's fair.</p> <p>12 Q. And then, finally, if there's any point in</p> <p>13 time where you want to sort of take a break, need a break,</p> <p>14 stretch your legs, use the restroom, just let me know. We</p> <p>15 can take a break any time. We'll probably take a break</p> <p>16 every hour, hour and a half just to give us a breather,</p> <p>17 but just let me know if you need to take a break.</p> <p>18 A. Okay.</p> <p>19 Q. Have you ever given a deposition prior to</p> <p>20 today?</p> <p>21 A. No.</p> <p>22 Q. Did you do anything to prepare for today's</p> <p>23 deposition?</p> <p>24 A. No.</p> <p>25 Q. Did you have any discussions with any</p>

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<p style="text-align: right;">Page 17</p> <p>1 attorneys for Mike Lindell or MyPillow in connection with</p> <p>2 today's deposition?</p> <p>3 A. Yes.</p> <p>4 Q. How many discussions did you have?</p> <p>5 A. One.</p> <p>6 Q. When was that conversation?</p> <p>7 A. Before my last one was canceled, the week</p> <p>8 before.</p> <p>9 Q. Okay. Approximately how long was that</p> <p>10 discussion?</p> <p>11 A. 30 minutes.</p> <p>12 Q. Who did you have that discussion with?</p> <p>13 A. Joe, I believe his name was.</p> <p>14 Q. Is that Joe Pull?</p> <p>15 A. I don't know.</p> <p>16 Q. You don't recall?</p> <p>17 A. I don't remember his last name.</p> <p>18 Q. Did you have any discussions with Mike Lindell</p> <p>19 about your deposition today?</p> <p>20 A. No.</p> <p>21 Q. Okay. Did you have any discussions with any</p> <p>22 other employees of MyPillow about your deposition today?</p> <p>23 A. I stated I'm going to a deposition.</p> <p>24 Q. Okay. Any other discussions with any</p> <p>25 employees of MyPillow?</p>	<p style="text-align: right;">Page 19</p> <p>1 Q. What is his last name?</p> <p>2 A. Dollerschell.</p> <p>3 Q. Is Curtis your maiden name?</p> <p>4 A. Yes.</p> <p>5 Q. Have you ever gone by any other names besides</p> <p>6 Dawn Curtis?</p> <p>7 A. Yes.</p> <p>8 Q. What other names?</p> <p>9 A. Robertson.</p> <p>10 Q. When did you go by Dawn Robertson?</p> <p>11 A. Let's see. I don't recall the dates. I was</p> <p>12 married to him for seven years.</p> <p>13 Q. Have you ever gone by any other names besides</p> <p>14 Dawn Curtis and Dawn Robertson?</p> <p>15 A. Yes, Erlanson.</p> <p>16 Q. How do you spell that?</p> <p>17 A. E-R-L-A-N-S-O-N.</p> <p>18 Q. And when did you go by the name Dawn Erlanson?</p> <p>19 A. 1989 to -- that was, I think, '96.</p> <p>20 Q. Have you ever gone by any other names?</p> <p>21 A. No.</p> <p>22 Q. Okay. What does your husband do for a living?</p> <p>23 A. He works in the warehouse at MyPillow.</p> <p>24 Q. How long has he worked for MyPillow?</p> <p>25 A. 10 years.</p>
<p style="text-align: right;">Page 18</p> <p>1 A. No.</p> <p>2 Q. Okay. Did you have any discussions about your</p> <p>3 deposition today with any other lawyers that represent</p> <p>4 Mike Lindell or MyPillow?</p> <p>5 A. No.</p> <p>6 Q. Okay. Before I ask you some -- maybe some</p> <p>7 questions about your employment, I want to go over some</p> <p>8 background questions.</p> <p>9 I think, earlier, you indicated that you live</p> <p>10 in Minnesota; correct?</p> <p>11 A. Correct.</p> <p>12 Q. And remind me, what was the town?</p> <p>13 A. Victoria.</p> <p>14 Q. Victoria, okay.</p> <p>15 How long have you lived in Victoria,</p> <p>16 Minnesota?</p> <p>17 A. Four years.</p> <p>18 Q. Okay. Are you married, Ms. Curtis?</p> <p>19 A. Yes.</p> <p>20 Q. How long have you been married?</p> <p>21 A. Five years.</p> <p>22 Q. Do you have a married name?</p> <p>23 A. No, just -- I go by Curtis.</p> <p>24 Q. What is your husband's name?</p> <p>25 A. Garry.</p>	<p style="text-align: right;">Page 20</p> <p>1 Q. Do you have any children?</p> <p>2 A. Yes.</p> <p>3 Q. How many?</p> <p>4 A. One.</p> <p>5 Q. What is your child's name?</p> <p>6 A. Dakota.</p> <p>7 Q. What is her last name?</p> <p>8 A. Erlanson.</p> <p>9 Q. And how old is your --</p> <p>10 A. Son.</p> <p>11 Q. -- is your son?</p> <p>12 A. 28.</p> <p>13 Q. 28, okay.</p> <p>14 And what does your son do for a living?</p> <p>15 A. He works for the military.</p> <p>16 Q. And do you have any grandchildren?</p> <p>17 A. Yes.</p> <p>18 Q. How many?</p> <p>19 A. One.</p> <p>20 Q. How old is your grandchild?</p> <p>21 A. 20 months.</p> <p>22 Q. Okay. I won't ask about your grandchild's</p> <p>23 employment. I'm assuming they don't have a job?</p> <p>24 A. I hope not.</p> <p>25 Q. Okay. You understand that Mike Lindell is a</p>

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<p style="text-align: right;">Page 21</p> <p>1 defendant in this case; correct?</p> <p>2 A. Yes.</p> <p>3 Q. And that the company that you work for,</p> <p>4 MyPillow, is also a defendant; correct?</p> <p>5 A. Correct.</p> <p>6 Q. And Mr. Lindell is the head of MyPillow;</p> <p>7 correct?</p> <p>8 A. Yes.</p> <p>9 Q. And Mr. Lindell is also, literally, the face</p> <p>10 of the MyPillow Company; right?</p> <p>11 A. Yes.</p> <p>12 Q. And Mr. Lindell has been the spokesperson or</p> <p>13 the main salesman for MyPillow since he began the company</p> <p>14 a number of years ago; is that right?</p> <p>15 A. Yes.</p> <p>16 Q. Do you know what this case is about?</p> <p>17 A. No.</p> <p>18 Q. Do you have any understanding of the subject</p> <p>19 matter of this case?</p> <p>20 A. Not really, no.</p> <p>21 Q. Okay. What is your relationship with</p> <p>22 Mike Lindell?</p> <p>23 A. He's my employer.</p> <p>24 Q. And how long have you known him?</p> <p>25 A. 10 years.</p>	<p style="text-align: right;">Page 23</p> <p>1 Q. How long have you known her?</p> <p>2 A. 10 years.</p> <p>3 Q. And I think you said that she lives in your</p> <p>4 building.</p> <p>5 Do you see her often?</p> <p>6 A. Yes.</p> <p>7 Q. How frequently do you see Mr. Lindell's</p> <p>8 mother?</p> <p>9 A. Once a week, maybe.</p> <p>10 Q. Okay. Did you ever have the occasion to live</p> <p>11 in the same household as Mike Lindell's mother?</p> <p>12 A. No.</p> <p>13 Q. I want to stay on the topic of your background</p> <p>14 but ask you a little bit about your education and</p> <p>15 employment history.</p> <p>16 Did you graduate from high school?</p> <p>17 A. Yes.</p> <p>18 Q. Where did you graduate?</p> <p>19 A. Anoka, Minnesota.</p> <p>20 Q. Thank you.</p> <p>21 And what did you do after you graduated</p> <p>22 high school?</p> <p>23 A. I went to work with my father at a</p> <p>24 dry-cleaner's for one year.</p> <p>25 Q. What did you do after that?</p>
<p style="text-align: right;">Page 22</p> <p>1 Q. Are you related in any way by blood to</p> <p>2 Mr. Lindell?</p> <p>3 A. No.</p> <p>4 Q. Are you related in any other way to</p> <p>5 Mr. Lindell?</p> <p>6 A. No.</p> <p>7 Q. Are you friends with Mr. Lindell?</p> <p>8 A. Yes.</p> <p>9 Q. Do you have a close personal relationship with</p> <p>10 Mr. Lindell?</p> <p>11 A. Yes.</p> <p>12 Q. Do you have a close professional relationship</p> <p>13 with him?</p> <p>14 A. Yes.</p> <p>15 Q. Do you have any -- strike that.</p> <p>16 Do you have a close personal relationship with</p> <p>17 any family members of Mr. Lindell?</p> <p>18 A. Yes.</p> <p>19 Q. Who?</p> <p>20 A. His mother.</p> <p>21 Q. What is his mother's name?</p> <p>22 A. Barbara.</p> <p>23 Q. And what's the nature of your relationship</p> <p>24 with Mike Lindell's mother, Barbara?</p> <p>25 A. She lives in our building.</p>	<p style="text-align: right;">Page 24</p> <p>1 A. I went to work for a music distributor,</p> <p>2 Dart Distributing.</p> <p>3 Q. And how long did you do that?</p> <p>4 A. Let's see. You're making me think here. Let</p> <p>5 me see. From '86 until 2013.</p> <p>6 Q. And what did you do at Dart Distributor?</p> <p>7 A. Everything, from picking orders to customer</p> <p>8 service.</p> <p>9 Q. What type of company was that?</p> <p>10 A. A music distributor.</p> <p>11 Q. Music distributor, okay.</p> <p>12 So you worked there for approximately</p> <p>13 seven years?</p> <p>14 A. No.</p> <p>15 Q. Oh, I'm sorry.</p> <p>16 A. 1986 until 2013.</p> <p>17 Q. Oh, okay. Much longer than that.</p> <p>18 A. Yeah.</p> <p>19 Q. Much longer than that. Okay. You're going to</p> <p>20 make me do math. 27 years.</p> <p>21 A. Okay. That's about right.</p> <p>22 Q. Okay. So you worked at Dart Distributor for</p> <p>23 about 27 years?</p> <p>24 A. Correct.</p> <p>25 Q. What was your position there at the time you</p>

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<p style="text-align: right;">Page 25</p> <p>1 left?</p> <p>2 A. I worked in the office doing invoicing.</p> <p>3 Q. At that point in time, did you begin working</p> <p>4 at MyPillow?</p> <p>5 A. I left there because the company went under,</p> <p>6 and I started working at MyPillow in 2013.</p> <p>7 Q. Okay. And when you started working at</p> <p>8 MyPillow in 2013, what was your position?</p> <p>9 A. Customer service.</p> <p>10 Q. Okay. And who were you hired by at MyPillow?</p> <p>11 A. Mike Lindell.</p> <p>12 Q. And did you know Mike Lindell before you got</p> <p>13 the job in 2013?</p> <p>14 A. I did not. My husband did.</p> <p>15 Q. How did your husband know Mr. Lindell?</p> <p>16 A. They went to school together.</p> <p>17 Q. High school, college?</p> <p>18 A. Elementary, middle school, high school.</p> <p>19 Q. Okay. Has your husband known Mike Lindell for</p> <p>20 a long time?</p> <p>21 A. Since 7th grade.</p> <p>22 Q. Okay. So for quite a few years?</p> <p>23 A. Yes.</p> <p>24 Q. How old is your husband?</p> <p>25 A. Same age as Mike; 62.</p>	<p style="text-align: right;">Page 27</p> <p>1 time?</p> <p>2 A. No.</p> <p>3 Q. Okay. And what were, generally, your</p> <p>4 responsibilities in that position?</p> <p>5 A. Getting the electric, paying for the show,</p> <p>6 getting merchandise to the show.</p> <p>7 Q. And how long did you do that at MyPillow,</p> <p>8 starting from 2013 until when?</p> <p>9 A. Two years.</p> <p>10 Q. Okay. And who did you report to in that</p> <p>11 position?</p> <p>12 A. Jennifer Duneman, D-U-N-E-M-A-N, I believe.</p> <p>13 Q. Was that a salary position at MyPillow?</p> <p>14 A. Yes. Strike that. That was not. That was an</p> <p>15 hourly, I apologize.</p> <p>16 Q. So you worked in that position for about</p> <p>17 two years.</p> <p>18 And then, afterwards, what position did you</p> <p>19 work at MyPillow?</p> <p>20 A. In marketing.</p> <p>21 Q. And that was approximately?</p> <p>22 A. 2015.</p> <p>23 Q. 2015, okay.</p> <p>24 A. Yes.</p> <p>25 Q. So around 2015, you moved into a marketing</p>
<p style="text-align: right;">Page 26</p> <p>1 Q. Okay. So they've known each other since</p> <p>2 about -- your husband and Mr. Lindell have known each</p> <p>3 other since childhood?</p> <p>4 A. Correct.</p> <p>5 Q. Okay. And do they remain close today?</p> <p>6 A. They are close today. They weren't so much</p> <p>7 out of high school.</p> <p>8 Q. Okay. How long has your husband and</p> <p>9 Mr. Lindell been close?</p> <p>10 A. Since we both been working there, since 2013.</p> <p>11 Q. Okay. So for at least over 10 years; correct?</p> <p>12 A. Yes.</p> <p>13 Q. Okay. So back to 2013 and your employment at</p> <p>14 MyPillow, you started in customer service and were hired</p> <p>15 by Mike Lindell.</p> <p>16 Is that fair?</p> <p>17 A. Fair.</p> <p>18 Q. Okay. And how long did you work in customer</p> <p>19 service?</p> <p>20 A. Two weeks.</p> <p>21 Q. And what happened after two weeks?</p> <p>22 A. I was promoted to setting up for home and</p> <p>23 garden shows, county fairs, all the paperwork for those</p> <p>24 fairs.</p> <p>25 Q. Did you have a position or a title at that</p>	<p style="text-align: right;">Page 28</p> <p>1 role at MyPillow; correct?</p> <p>2 A. Yes.</p> <p>3 Q. Did you have a formal title?</p> <p>4 A. Not at the time.</p> <p>5 Q. Who did you report to in that marketing role</p> <p>6 in 2015?</p> <p>7 A. Jessica Maskovich.</p> <p>8 Q. And what was her position at that time?</p> <p>9 A. I believe CMO.</p> <p>10 Q. Chief marketing officer?</p> <p>11 A. Yes.</p> <p>12 Q. And in that initial position in marketing that</p> <p>13 you took in 2015, how long did you remain in that position</p> <p>14 at MyPillow?</p> <p>15 A. I'm still in marketing.</p> <p>16 Q. Okay. You have a marketing position today;</p> <p>17 correct?</p> <p>18 A. That's correct.</p> <p>19 Q. Okay. And so, you've been in marketing at</p> <p>20 MyPillow from 2015 up through present, so approximately</p> <p>21 eight years?</p> <p>22 A. Correct.</p> <p>23 Q. Okay. Can you sort of describe for me during</p> <p>24 that period of time the titles or roles that you've held</p> <p>25 in marketing along with your responsibilities over time.</p>

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<p style="text-align: right;">Page 29</p> <p>1 MS. OLIVER: Objection to form.</p> <p>2 You can answer.</p> <p>3 A. I, basically, do the same thing. My job</p> <p>4 titles changed a couple times. I don't know why, but I</p> <p>5 work with radio stations and podcasters, just doing their</p> <p>6 advertising. So they do, you know, 60-second scripts for</p> <p>7 talent, promoting MyPillow.</p> <p>8 BY MS. WRIGLEY:</p> <p>9 Q. So in 2015, you came into a marketing role;</p> <p>10 correct?</p> <p>11 A. Yes.</p> <p>12 Q. Okay. And during that time, part of your</p> <p>13 responsibilities were to have interactions on behalf of</p> <p>14 MyPillow with radio stations and podcasters; correct?</p> <p>15 A. Correct.</p> <p>16 Q. And during that time, you worked with them on</p> <p>17 advertising; correct?</p> <p>18 A. Correct.</p> <p>19 Q. And during that time, you worked with them on</p> <p>20 scripts for advertisements or spots to sell MyPillow</p> <p>21 products; correct?</p> <p>22 A. Correct.</p> <p>23 Q. Okay. And you've had those responsibilities</p> <p>24 continuously from 2015 until present?</p> <p>25 A. Correct.</p>	<p style="text-align: right;">Page 31</p> <p>1 Q. How many?</p> <p>2 A. One.</p> <p>3 Q. Who reports to you?</p> <p>4 A. Emily Carlson.</p> <p>5 Q. How long has Emily Carlson reported to you in</p> <p>6 marketing?</p> <p>7 A. Two years.</p> <p>8 Q. Since around 2021; is that right?</p> <p>9 A. That sounds right.</p> <p>10 Q. What is Ms. Carlson's position or role at</p> <p>11 MyPillow?</p> <p>12 A. She sends out sales tracking emails, sets up</p> <p>13 some of our new podcasters with promo codes, sends out</p> <p>14 scripts.</p> <p>15 Q. Anything else?</p> <p>16 A. No.</p> <p>17 Q. And did you know Ms. Carlson before she took</p> <p>18 this position?</p> <p>19 A. Yes.</p> <p>20 Q. How did you know her?</p> <p>21 A. She is Mike Lindell's niece.</p> <p>22 Q. How much is your current annual salary that</p> <p>23 you receive from MyPillow?</p> <p>24 A. \$104,000.</p> <p>25 Q. And has your salary sort of changed over time</p>
<p style="text-align: right;">Page 30</p> <p>1 Q. And then, in marketing at MyPillow from 2015</p> <p>2 to 2023, or currently, you've held a number of positions</p> <p>3 or formal titles; is that right?</p> <p>4 A. Two different titles, I believe.</p> <p>5 Q. What are those two titles?</p> <p>6 A. I believe the first one was director of</p> <p>7 marketing, and current, VP of media relations.</p> <p>8 Q. Over that period of time from 2015 to present,</p> <p>9 did you always report to Jessica Maskovich?</p> <p>10 A. I reported to Jessica up until, I believe,</p> <p>11 2020.</p> <p>12 Q. In 2020, who did you start reporting to?</p> <p>13 A. Mike Lindell.</p> <p>14 Q. Have you reported, in your role in marketing,</p> <p>15 to Mike Lindell from 2020 through present?</p> <p>16 A. Yes.</p> <p>17 Q. Okay. What was the reason for the change in</p> <p>18 reporting structure?</p> <p>19 A. I don't know. You'd have to ask Jessica and</p> <p>20 Mike.</p> <p>21 Q. In that marketing role that you've held for</p> <p>22 the last 18 years, are you in a salary position?</p> <p>23 A. Yes.</p> <p>24 Q. Do you have any employees that report to you?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 32</p> <p>1 in your position in marketing from 2015 to present?</p> <p>2 A. Yes.</p> <p>3 Q. Okay. What was the salary that you started at</p> <p>4 in 2015?</p> <p>5 A. I believe \$60,000, possibly.</p> <p>6 Q. So your salary has increased during your time</p> <p>7 in marketing at MyPillow from 2015 to 2023?</p> <p>8 A. Yes.</p> <p>9 Q. Do you receive health benefits from MyPillow?</p> <p>10 A. Yes.</p> <p>11 Q. Have you always received health benefits from</p> <p>12 MyPillow?</p> <p>13 A. Yes.</p> <p>14 Q. Do you receive any other benefits from</p> <p>15 MyPillow?</p> <p>16 A. I just received stock, I believe a year and a</p> <p>17 half ago, two years ago -- year and a half.</p> <p>18 Q. So do you have any shares or stock in</p> <p>19 MyPillow?</p> <p>20 A. Yes.</p> <p>21 Q. How many?</p> <p>22 A. I don't know.</p> <p>23 Q. When were they awarded?</p> <p>24 A. I believe a year and a half ago.</p> <p>25 Q. Do you have any paperwork that identifies the,</p>

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<p style="text-align: right;">Page 33</p> <p>1 sort of, the amount of shares or stock that you have in 2 MyPillow? 3 A. I believe so. I was given something, but I 4 didn't look at it. 5 Q. Is it stock or stock options? 6 A. I don't know. 7 Q. Do you have any stock options at MyPillow? 8 A. I don't know. 9 Q. Okay. What was the reason that you 10 obtained -- or what was your understanding of the reason 11 why you obtained shares or stock in MyPillow about a year 12 and a half ago? 13 MS. OLIVER: Objection to form. 14 You can answer. 15 A. Because somebody had quit who had stock, and 16 the stock became available. 17 BY MS. WRIGLEY: 18 Q. Who quit? 19 A. I don't recall who it was. 20 Q. Have you received any bonuses from MyPillow 21 during your employment there? 22 A. Yes. 23 Q. How many bonuses have you received? 24 A. We get a bonus each year at Christmas. 25 Q. So during your employment at MyPillow, have</p>	<p style="text-align: right;">Page 35</p> <p>1 with him daily. 2 Q. Anyone else on the board do you communicate 3 with regularly in your position in marketing? 4 A. I only know -- I don't really know who's on 5 the board right now. I believe Brad Carlson is, and I 6 speak with him. 7 Q. Anyone else? 8 A. I don't recall who else is on the board. 9 Q. Who is Mr. Carlson? 10 A. He is product development at MyPillow. 11 Q. How often do you interact with Mr. Carlson in 12 connection with your job at MyPillow? 13 A. We communicate every day. 14 Q. What types of things do you and Mr. Carlson 15 communicate about? 16 A. Well, we're the only ones there at 6:00 a.m., 17 so just about how our day is going to go. 18 Q. How about in connection with any MyPillow 19 official business? 20 A. I just ask him what new product's coming out, 21 and colors, and just about product. 22 Q. Do you -- I think you mentioned going in at 23 6:00 a.m. 24 Do you go into an office in connection with 25 your work at MyPillow?</p>
<p style="text-align: right;">Page 34</p> <p>1 you generally received a Christmas or an annual bonus from 2 MyPillow? 3 A. Yes. 4 Q. And what was the amount of the bonus that you 5 received last year? 6 A. \$2,000. 7 Q. How about the year before? 8 A. \$2,000. 9 Q. Okay. Have you ever received a bonus from 10 MyPillow that was larger than \$2,000? 11 A. No. 12 Q. Are you or have you ever been a member of the 13 MyPillow Board of Directors? 14 A. No. 15 Q. Do you know who the current board members of 16 MyPillow are? 17 A. Not currently. 18 Q. Have you ever reported to the board in your 19 position in marketing? 20 A. No. 21 Q. Okay. In your position in marketing, have you 22 ever had any interactions with the board? 23 A. Yes. 24 Q. Describe the nature of those interactions. 25 A. Mike Lindell is on the board. I communicate</p>	<p style="text-align: right;">Page 36</p> <p>1 A. Yes. 2 Q. And where is the office located that you go 3 into every day for work? 4 A. The address? 5 Q. Yes. 6 A. 1550 Audubon Road, Chaska. 7 Q. And that's the headquarters of MyPillow; 8 correct? 9 A. That's correct. 10 Q. Okay. And prior to that time, did MyPillow 11 have an office at a different location? 12 A. Yes. 13 Q. Okay. What was the other location? 14 A. I believe it was 343 East 82nd Street, Chaska. 15 Q. Okay. And when did MyPillow move from the 16 prior address to -- 17 A. I don't recall if it's two or three years 18 we've been at the new location. 19 Q. Okay. And did you have an office or a space 20 at the office, regardless of which location during your 21 employment at MyPillow in marketing? 22 A. I had a space, yes. 23 Q. Okay. And then, do you go into the office 24 every day in connection with doing your job? 25 A. Yes.</p>

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<p style="text-align: right;">Page 37</p> <p>1 THE VIDEOGRAPHER: We're going off the</p> <p>2 record. The time now is 9:24 a.m.</p> <p>3 (Discussion off the record.)</p> <p>4 THE VIDEOGRAPHER: We are going back on</p> <p>5 the record. The time now is 9:27 a.m.</p> <p>6 BY MS. WRIGLEY:</p> <p>7 Q. Ms. Curtis, I think when we left, I was asking</p> <p>8 you about going to the office for work.</p> <p>9 Is it fair to say that you regularly go into</p> <p>10 the MyPillow headquarters office to do your job?</p> <p>11 A. Yes.</p> <p>12 Q. And do you sit near any other employees at</p> <p>13 MyPillow there?</p> <p>14 A. Mike Lindell.</p> <p>15 Q. Okay.</p> <p>16 A. Ben Salden.</p> <p>17 Q. Anyone else?</p> <p>18 A. Darren Lindell is across the hall.</p> <p>19 Q. And do you interact with those individuals on</p> <p>20 a daily basis?</p> <p>21 A. Yes.</p> <p>22 Q. Any other MyPillow employees that sit near you</p> <p>23 that you interact with regularly as part of your job?</p> <p>24 A. My assistant, Emily Carlson and</p> <p>25 Heidi O'Donnell.</p>	<p style="text-align: right;">Page 39</p> <p>1 A. It varies from once to five.</p> <p>2 Q. And do you frequently text with Mr. Lindell?</p> <p>3 A. Yes.</p> <p>4 Q. Do you and Mr. Lindell have any phone calls on</p> <p>5 a daily basis?</p> <p>6 A. Yes.</p> <p>7 Q. And on a daily basis, do you and Mr. Lindell</p> <p>8 have regular meetings?</p> <p>9 A. No.</p> <p>10 Q. Okay. Do you ever have any sort of standard</p> <p>11 or formal meetings with Mr. Lindell in your marketing</p> <p>12 position?</p> <p>13 A. Occasionally.</p> <p>14 Q. What's the nature of those meetings?</p> <p>15 A. Marketing, what we're going to promote.</p> <p>16 Q. Are they standard or formal meetings, or do</p> <p>17 they get scheduled as needed?</p> <p>18 A. As needed.</p> <p>19 Q. And I think I asked you about phone calls and</p> <p>20 texts.</p> <p>21 Do you and Mr. Lindell communicate in any</p> <p>22 other way?</p> <p>23 A. That's about it.</p> <p>24 Q. Okay.</p> <p>25 A. Verbally, I mean.</p>
<p style="text-align: right;">Page 38</p> <p>1 Q. And who is Heidi O'Donnell?</p> <p>2 A. She does social media.</p> <p>3 Q. Okay. Does MyPillow have any other office or</p> <p>4 facilities in Minnesota?</p> <p>5 A. We have a warehouse in Shakopee.</p> <p>6 Q. Is that where your husband works?</p> <p>7 A. Yes.</p> <p>8 Q. Okay. And do you go to the warehouse in</p> <p>9 Shakopee in connection with your job at all?</p> <p>10 A. I think I was there once last year.</p> <p>11 Q. How many hours do you typically work in your</p> <p>12 marketing position at MyPillow?</p> <p>13 A. I would say 50.</p> <p>14 Q. What hours each day do you typically work?</p> <p>15 A. 6:00 a.m. and until 3:00, and then probably</p> <p>16 another hour or two at home each night.</p> <p>17 Q. And was that true in 2020 through 2023?</p> <p>18 A. Yes.</p> <p>19 Q. I think you had mentioned in your marketing</p> <p>20 position at MyPillow that you interact with Mike Lindell</p> <p>21 on a daily basis.</p> <p>22 Is that right?</p> <p>23 A. Yes.</p> <p>24 Q. How many times per day do you typically</p> <p>25 communicate with Mike Lindell in your position?</p>	<p style="text-align: right;">Page 40</p> <p>1 Q. In person?</p> <p>2 A. Face-to-face, yeah.</p> <p>3 Q. Okay. So in connection with your MyPillow, is</p> <p>4 it fair to say that your interactions with Mike Lindell</p> <p>5 are typically either in-person conversations,</p> <p>6 conversations over the phone, or conversations via text?</p> <p>7 A. Correct.</p> <p>8 Q. Okay. How about email?</p> <p>9 A. He doesn't email much.</p> <p>10 Q. Okay. Do you have an email address at</p> <p>11 MyPillow?</p> <p>12 A. Yes, I do.</p> <p>13 Q. Has that been the same email address, sort of,</p> <p>14 in the last 10 years?</p> <p>15 A. Yes.</p> <p>16 Q. Do you have more than one email address with</p> <p>17 MyPillow?</p> <p>18 A. Yes.</p> <p>19 Q. Okay. What's -- can you just identify each of</p> <p>20 the email addresses that you have with MyPillow?</p> <p>21 A. Dawn@mypillow.com.</p> <p>22 Q. What's the other one?</p> <p>23 A. Dcurtis@mypillow.com.</p> <p>24 Q. How long have you had each of those email</p> <p>25 addresses?</p>

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<p style="text-align: right;">Page 41</p> <p>1 A. I believe since I started in 2013.</p> <p>2 Q. What is the reason that you have two different</p> <p>3 email addresses?</p> <p>4 A. I don't know.</p> <p>5 Q. Do you use them for different functions at</p> <p>6 work?</p> <p>7 A. No. I use dawn@mypillow.com, and sometimes</p> <p>8 they come across as D. Curtis. I don't know.</p> <p>9 Q. Okay. Do you have a computer that you use for</p> <p>10 work at MyPillow?</p> <p>11 A. Yes.</p> <p>12 Q. Is it a desktop or a laptop?</p> <p>13 A. I have a desktop, and I have a laptop at home.</p> <p>14 Q. Okay. Did you get both of those computers</p> <p>15 from MyPillow?</p> <p>16 A. Yes.</p> <p>17 Q. Do you have documents from work -- from your</p> <p>18 work at MyPillow saved on those computers?</p> <p>19 A. Yes.</p> <p>20 Q. What type of documents?</p> <p>21 A. Everything that I've ever done.</p> <p>22 Q. Do you create or prepare any documents in</p> <p>23 connection with your work at MyPillow?</p> <p>24 A. I create scripts. I don't know. All of my</p> <p>25 work is, basically, saved.</p>	<p style="text-align: right;">Page 43</p> <p>1 that provide you with information about the sale of</p> <p>2 MyPillow products?</p> <p>3 A. I don't understand the question.</p> <p>4 Q. Are there any electronic tools or platforms</p> <p>5 that you can obtain information on revenue from sales of</p> <p>6 MyPillow products?</p> <p>7 A. I don't understand what you're talking about.</p> <p>8 Q. Okay. Let me ask you so the record is clear,</p> <p>9 what is your understanding of the business of MyPillow?</p> <p>10 MS. OLIVER: Objection to form.</p> <p>11 You can answer.</p> <p>12 A. We sell MyPillow products.</p> <p>13 BY MS. WRIGLEY:</p> <p>14 Q. How long has MyPillow been in business?</p> <p>15 A. He invented the first pillow in 2004, I think.</p> <p>16 We became incorporated in 2007 -- 2009, one of those two.</p> <p>17 Q. Does MyPillow sell products to consumers?</p> <p>18 A. Yes.</p> <p>19 Q. Does MyPillow sell pillows to consumers?</p> <p>20 A. Yes.</p> <p>21 Q. And it's fair to say that Mike Lindell started</p> <p>22 MyPillow out selling pillows to consumers?</p> <p>23 A. Yes.</p> <p>24 Q. Today, MyPillow sells more than just pillows</p> <p>25 to consumers; correct?</p>
<p style="text-align: right;">Page 42</p> <p>1 Q. Okay. Besides scripts, what other type of</p> <p>2 documents would you prepare or create to do your work at</p> <p>3 MyPillow?</p> <p>4 A. Invoicing for my stations, podcasters,</p> <p>5 influencers.</p> <p>6 Q. Any other types of documents?</p> <p>7 A. Not that I can think of.</p> <p>8 Q. And do you save those documents on your</p> <p>9 computers, or is there, like, a saved or a shared drive or</p> <p>10 internal place for MyPillow employees?</p> <p>11 A. I save it on my desktop.</p> <p>12 Q. Do you have access to any internal systems or</p> <p>13 shared platforms for your work at MyPillow?</p> <p>14 A. Not to my knowledge.</p> <p>15 Q. Okay. Do you have a cell phone or a mobile</p> <p>16 device that you use for your work at MyPillow?</p> <p>17 A. I have a personal cell phone that I use.</p> <p>18 Q. Do you use that for work at MyPillow?</p> <p>19 A. I have -- people call, yes.</p> <p>20 Q. Do you text Mike Lindell about work using the</p> <p>21 cell phone?</p> <p>22 A. Yes.</p> <p>23 Q. What is the number of your cell phone?</p> <p>24 A. 952-913-8557.</p> <p>25 Q. Do you have access to any electronic systems</p>	<p style="text-align: right;">Page 44</p> <p>1 A. Correct.</p> <p>2 Q. What other types of products does MyPillow</p> <p>3 sell to consumers?</p> <p>4 A. Sheets, blankets, dog beds, mattresses,</p> <p>5 mattress toppers, slippers, towels.</p> <p>6 Q. During the time that you've been employed at</p> <p>7 MyPillow, has MyPillow done marketing or advertising to</p> <p>8 sell its pillows and some of the other products that you</p> <p>9 mentioned to consumers?</p> <p>10 A. Yes.</p> <p>11 Q. Does Mike Lindell typically appear in that</p> <p>12 advertising?</p> <p>13 A. Yes.</p> <p>14 Q. Is Mike Lindell the main spokesperson for the</p> <p>15 MyPillow company and the sale of its products?</p> <p>16 A. Yes.</p> <p>17 Q. And is Mike Lindell one of the main, if not</p> <p>18 the most important ways, that Mike Lindell sells products</p> <p>19 to its consumers?</p> <p>20 MS. OLIVER: Objection to form.</p> <p>21 You can answer.</p> <p>22 A. Yes.</p> <p>23 BY MS. WRIGLEY:</p> <p>24 Q. I'm going to show you a document. I'm going</p> <p>25 to mark our first exhibit, the website one.</p>

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<p style="text-align: right;">Page 45</p> <p>1 Ms. Curtis, I'm going to mark an exhibit and</p> <p>2 hand it to you. When you get it, just take a minute --</p> <p>3 I'll walk you through it. Just take a minute to review</p> <p>4 it.</p> <p>5 We're starting at Exhibit 405, but just so you</p> <p>6 know that's because we're -- in all the depositions that</p> <p>7 were taking place, we're doing continuous numbering, so</p> <p>8 the first one today will be 405, and then they'll continue</p> <p>9 sequentially.</p> <p>10 (Whereupon, Exhibit 405 was marked.)</p> <p>11 BY MS. WRIGLEY:</p> <p>12 Q. Ms. Curtis, I've handed to you a printout of</p> <p>13 some information from the MyPillow website home page.</p> <p>14 At the bottom, you'll see some text, and</p> <p>15 that's just sort of a capture of the time in which</p> <p>16 somebody went onto the website and printed this out, so</p> <p>17 this is what was reflected on the MyPillow website home</p> <p>18 page as of September 7th at the time mentioned below. And</p> <p>19 also, at the bottom, I think, has the capture. You can</p> <p>20 see it's mypillow.com, and it's the home page.</p> <p>21 Just take a minute to review this capture of</p> <p>22 the website and Exhibit 405, and I'm just going to ask you</p> <p>23 a few questions about it. Let me know when you're ready.</p> <p>24 A. I'm ready.</p> <p>25 Q. Are you familiar with the MyPillow website?</p>	<p style="text-align: right;">Page 47</p> <p>1 for a variety of additional MyPillow products?</p> <p>2 A. Yes.</p> <p>3 Q. And these sort of ads, if you look on the</p> <p>4 first page and sort of the second page and continuing,</p> <p>5 include many of the consumer products that you mentioned</p> <p>6 earlier that MyPillow sells, such as sort of towels and</p> <p>7 sheets and slippers, et cetera?</p> <p>8 A. Yes.</p> <p>9 Q. Okay. And if you look through this -- and</p> <p>10 again, this is printed from the website -- is this sort of</p> <p>11 representative of the type of home products that MyPillow</p> <p>12 sells to consumers?</p> <p>13 A. Yes.</p> <p>14 Q. Now, looking at the different advertisements</p> <p>15 that appears on this website, MyPillow website print in</p> <p>16 Exhibit 405, do you see that each of them has a reference</p> <p>17 to promo code?</p> <p>18 A. Yes.</p> <p>19 Q. What is the promo code reference?</p> <p>20 A. That's how we track where people -- if they</p> <p>21 watched a TV commercial or listen to a radio station,</p> <p>22 that's how we track where our sales come from.</p> <p>23 Q. And do each of the sort of radio podcaster</p> <p>24 influences [sic] that help sell MyPillow products get</p> <p>25 assigned promo codes to use?</p>
<p style="text-align: right;">Page 46</p> <p>1 A. Yes, I am.</p> <p>2 Q. And how are you familiar with the website of</p> <p>3 MyPillow?</p> <p>4 A. This is where I direct my radio, podcasters</p> <p>5 and influencers to --</p> <p>6 THE REPORTER: I'm sorry?</p> <p>7 A. This is where I direct my radio stations,</p> <p>8 podcasters and influencers to.</p> <p>9 BY MS. WRIGLEY:</p> <p>10 Q. And what would be the purpose of directing the</p> <p>11 radio podcasters and influencers to the MyPillow website?</p> <p>12 A. Because when they're doing the script, this is</p> <p>13 where they drive their listeners to purchase products.</p> <p>14 Q. Now, sort of looking at what's printed on</p> <p>15 Exhibit 405 from the MyPillow website, do you see that the</p> <p>16 first thing that appears here, at least as of this time,</p> <p>17 was an ad for bed sheets, and it's got Mike Lindell in</p> <p>18 that sort of advertisement picture?</p> <p>19 A. Yes.</p> <p>20 Q. Okay. And do you see that it references use</p> <p>21 of a promo code?</p> <p>22 A. Yes.</p> <p>23 Q. Okay. And then, if you look below that sort</p> <p>24 of main advertisement that's in the box at the top, do you</p> <p>25 see that there's sort of a number of small pictures or ads</p>	<p style="text-align: right;">Page 48</p> <p>1 A. Yes.</p> <p>2 Q. Who assigns those promo codes to them?</p> <p>3 A. They suggest a promo code, and I let them know</p> <p>4 if it's available or not.</p> <p>5 Q. Okay. Does MyPillow sell any products without</p> <p>6 promo codes?</p> <p>7 A. People purchase without using a promo code,</p> <p>8 yes.</p> <p>9 Q. What is the purpose of a promo code?</p> <p>10 A. You get a discounted price.</p> <p>11 Q. And is the promo code used at MyPillow to help</p> <p>12 facilitate consumers to buy MyPillow products?</p> <p>13 A. A promo code is used to get a discount on the</p> <p>14 MyPillow products.</p> <p>15 Q. Now, if you go a number of pages in, and at</p> <p>16 the bottom, it kind of has a page reference where it says</p> <p>17 "page 1 of 7" and so on, and I'm going to ask you to turn</p> <p>18 your attention to page 6 of 7.</p> <p>19 Do you see that there's sort of an image there</p> <p>20 that says, "Discover Our Guarantee." There's some</p> <p>21 language about that guarantee below that heading, and then</p> <p>22 there's sort of a video screenshot on the page.</p> <p>23 Do you see that?</p> <p>24 A. Yes.</p> <p>25 Q. And then the -- it has sort of a quote above</p>

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<p style="text-align: right;">Page 49</p> <p>1 it from Mike Lindell about, "I personally guarantee it</p> <p>2 will be the most comfortable pillow you ever owned."</p> <p>3 Do you see that?</p> <p>4 A. Yes.</p> <p>5 Q. And then, below that screenshot, do you see</p> <p>6 that Mike Lindell is sort of sitting there with a pillow?</p> <p>7 A. Yes.</p> <p>8 Q. Okay. And then, are you familiar with that</p> <p>9 guarantee?</p> <p>10 A. I've heard him say it, yes.</p> <p>11 Q. Okay. And would you agree that it's sort of</p> <p>12 normal or customary for, sort of, Mike Lindell to appear</p> <p>13 in the majority of, sort of, the commercials or the</p> <p>14 advertisements for MyPillow products?</p> <p>15 A. Yes.</p> <p>16 Q. Okay. If you go back to the first page, at</p> <p>17 the very top, do you see that there's two phone numbers --</p> <p>18 A. Yes.</p> <p>19 Q. -- by the MyPillow logo. One says, "Order</p> <p>20 now."</p> <p>21 A. Yes.</p> <p>22 Q. And it's got a 1-800 number.</p> <p>23 Do you see that?</p> <p>24 A. I do.</p> <p>25 Q. And can consumers buy products by calling that</p>	<p style="text-align: right;">Page 51</p> <p>1 A. I don't understand what your --</p> <p>2 Q. Okay. In order for them to -- I think you had</p> <p>3 said that you direct radio, podcasters and influencers to</p> <p>4 the websites; right?</p> <p>5 A. Yes.</p> <p>6 Q. Okay. So if any radio, podcaster or</p> <p>7 influencer is advertising MyPillow, would they typically</p> <p>8 direct them to the 1-800 number or the MyPillow website to</p> <p>9 buy products?</p> <p>10 A. Each radio station, podcaster and influencer,</p> <p>11 they have their own unique 800 number, not this one.</p> <p>12 Q. Okay. Is the reason that each one of them has</p> <p>13 their own unique 800 number in order to track the amount</p> <p>14 of revenues or sales that they're generating for MyPillow?</p> <p>15 MS. OLIVER: Objection to form.</p> <p>16 But you can answer.</p> <p>17 A. It also helps our sales department know where</p> <p>18 they're from -- they're listening. Their promo code will</p> <p>19 automatically populate for our sales team when it comes</p> <p>20 in.</p> <p>21 BY MS. WRIGLEY:</p> <p>22 Q. Does each radio podcasters influencer have</p> <p>23 their own unique promo codes?</p> <p>24 A. Yes.</p> <p>25 Q. They all, each, have their own unique</p>
<p style="text-align: right;">Page 50</p> <p>1 1-800 number?</p> <p>2 A. Yes.</p> <p>3 Q. Okay. And consumers buy products on the</p> <p>4 website; correct?</p> <p>5 A. Yes.</p> <p>6 Q. Okay. Besides calling the 1-800 number and</p> <p>7 going to the MyPillow website, where else can a consumer</p> <p>8 buy a MyPillow product?</p> <p>9 A. I believe a few retail stores.</p> <p>10 Q. Okay. Retail stores.</p> <p>11 Any other places where a consumer may go to</p> <p>12 buy a MyPillow product?</p> <p>13 A. No.</p> <p>14 Q. So consumers who want to buy products from</p> <p>15 MyPillow would go to the website; correct?</p> <p>16 A. Yes.</p> <p>17 Q. They would call a 1-800 number; correct?</p> <p>18 A. Yes.</p> <p>19 Q. They could also go to a retailer that carries</p> <p>20 a MyPillow product?</p> <p>21 A. Yes.</p> <p>22 Q. Okay. And in terms of any -- of the persons</p> <p>23 or entities you mentioned before -- radio, podcasters and</p> <p>24 influencers -- do they have any sort of vehicles or places</p> <p>25 where consumers can buy MyPillow products?</p>	<p style="text-align: right;">Page 52</p> <p>1 800 number?</p> <p>2 A. Yes.</p> <p>3 Q. Okay. Would they also, then, direct consumers</p> <p>4 to the website?</p> <p>5 A. Yes.</p> <p>6 Q. And then, is it fair to say that as a result</p> <p>7 of each radio podcaster and influencer having their own</p> <p>8 unique 800 number or promo code number, MyPillow is able</p> <p>9 to identify any revenue or sales that have come from each</p> <p>10 of them?</p> <p>11 A. Yes.</p> <p>12 Q. I'm going to give you another exhibit. You</p> <p>13 can put that one to the side.</p> <p>14 MS. WRIGLEY: The next one I'll mark</p> <p>15 will be 406.</p> <p>16 (Whereupon, Exhibit 406 was marked.)</p> <p>17 BY MS. WRIGLEY:</p> <p>18 Q. Ms. Curtis, the court reporter has handed to</p> <p>19 you what has been marked Exhibit 406. I'll represent to</p> <p>20 you that this is another printout from the MyPillow</p> <p>21 website.</p> <p>22 At the bottom left-hand corner, it gives</p> <p>23 information about the website this information was</p> <p>24 captured on, the date or the time stamp from when it was</p> <p>25 captured. So this would reflect the information on the</p>

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<p style="text-align: right;">Page 53</p> <p>1 MyPillow website as of the date at the very bottom.</p> <p>2 This, for the record, has a number of</p> <p>3 printouts that go with a number of, sort of, the tabs of</p> <p>4 the sections that are listed at the top where it goes</p> <p>5 through MyPillows, bedding, mattresses, mattress toppers,</p> <p>6 MySlipper/Footwear, clothing, towels, pet, accessory</p> <p>7 pillows, Mike's products and clearance.</p> <p>8 Do you see that at the top?</p> <p>9 A. Yes.</p> <p>10 Q. So just so you understand the exhibit, the</p> <p>11 first couple of pages would be the information at this</p> <p>12 point in time when it was captured that was from the, sort</p> <p>13 of, MyPillow's tab.</p> <p>14 Then, when you get into it, the next section</p> <p>15 would be what was captured when you got to the next tab of</p> <p>16 bedding. A couple pages in would be what was captured for</p> <p>17 mattresses, and then so on.</p> <p>18 A. Correct.</p> <p>19 Q. Does that make sense?</p> <p>20 A. Yes.</p> <p>21 Q. Okay. And if you just look through this</p> <p>22 document, does this show all of the various, sort of,</p> <p>23 products that MyPillow sells to consumers?</p> <p>24 A. Yes.</p> <p>25 Q. And are you familiar with, sort of, many of</p>	<p style="text-align: right;">Page 55</p> <p>1 A. Correct.</p> <p>2 Q. And then, MyPillow would have a record of that</p> <p>3 sale that had been done with that promo code, and MyPillow</p> <p>4 would be able to identify that that sale was associated</p> <p>5 with somebody who had listened to that podcast; correct?</p> <p>6 MS. OLIVER: Objection to form.</p> <p>7 You can answer.</p> <p>8 A. Yes.</p> <p>9 BY MS. WRIGLEY:</p> <p>10 Q. Is it sort of fair to say that the use of</p> <p>11 promo codes is, sort of, a regularly-used marketing</p> <p>12 strategy of MyPillow to sell products to consumers?</p> <p>13 A. Yes.</p> <p>14 Q. Okay. And is that use of promo codes a</p> <p>15 marketing tactic that MyPillow has made use of during your</p> <p>16 time in marketing, sort of, for the last, I don't know,</p> <p>17 10 or so years?</p> <p>18 A. Yes.</p> <p>19 Q. Okay. And do you regularly report to</p> <p>20 Mike Lindell on the uses of promo codes in your role in</p> <p>21 marketing at MyPillow?</p> <p>22 A. Yes, when there's a deviation.</p> <p>23 Q. Okay. I want to go to the section which I</p> <p>24 think is one of the ones at the, sort of, the end of this</p> <p>25 list, "Mike's Products." It's on -- it's sort of near the</p>
<p style="text-align: right;">Page 54</p> <p>1 these products and the types of advertisements that appear</p> <p>2 on the MyPillow website for those products?</p> <p>3 A. Yes.</p> <p>4 Q. And if you look through all these different</p> <p>5 advertisements, many, if not all of them, have a reference</p> <p>6 of a product, a sale price, and then with a promo code.</p> <p>7 Do you see that?</p> <p>8 A. Yes.</p> <p>9 Q. Okay. And if you were to, sort of, click on,</p> <p>10 let's just take -- on the first page, the limited edition</p> <p>11 MyPillow that appears at the very top, if I were to kind</p> <p>12 of click on this and it says, "With Promo Code," would</p> <p>13 there be a place for me to put in a -- if I were a</p> <p>14 consumer, for me to put in a promo code that I had</p> <p>15 obtained somewhere for MyPillow product?</p> <p>16 A. At checkout, yes.</p> <p>17 Q. Okay. And then, for example, if I had</p> <p>18 listened to a podcast and they gave a promo code, I could</p> <p>19 go to the website, I could click in here, I could put in</p> <p>20 that promo code, and that would give me a discount on a</p> <p>21 MyPillow product; is that right?</p> <p>22 A. Yes.</p> <p>23 Q. Okay. And that promo code would be, sort of,</p> <p>24 associated with the podcast that I listened to; is that</p> <p>25 right?</p>	<p style="text-align: right;">Page 56</p> <p>1 back, one, two, three, four -- about seven pages from the</p> <p>2 back.</p> <p>3 Do you see that section?</p> <p>4 A. Yes.</p> <p>5 Q. At the top, it says, "Mike's Products," and</p> <p>6 then it has, sort of, three products -- images for three</p> <p>7 different products underneath there.</p> <p>8 Do you see that?</p> <p>9 A. Yes.</p> <p>10 Q. Does MyPillow sell merchandise specific to</p> <p>11 Mike Lindell?</p> <p>12 A. It looks like these three.</p> <p>13 Q. Are you familiar with these three products?</p> <p>14 A. Yes.</p> <p>15 Q. And the first one, starting at the left, is a</p> <p>16 book of Mike Lindell's; is that right?</p> <p>17 A. Yes.</p> <p>18 Q. And MyPillow sells a book that Mike Lindell</p> <p>19 wrote called, What Are the Odds?</p> <p>20 A. Yes.</p> <p>21 Q. It also sells, going to the next product, a</p> <p>22 bobble head of Mike Lindell; is that correct?</p> <p>23 A. Yes.</p> <p>24 Q. And then looking to the third one, it sells a</p> <p>25 life-sized cardboard of Mike Lindell.</p>

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<p style="text-align: right;">Page 57</p> <p>1 Do you see that?</p> <p>2 A. Yes.</p> <p>3 Q. Okay. Do you own any of these products</p> <p>4 from -- of Mike Lindell?</p> <p>5 A. A book.</p> <p>6 Q. Okay. Would you agree that Mike Lindell and</p> <p>7 MyPillow are fairly interchangeable?</p> <p>8 MS. OLIVER: Objection to form.</p> <p>9 You can answer.</p> <p>10 A. I guess I don't understand the question.</p> <p>11 BY MS. WRIGLEY:</p> <p>12 Q. Let me ask a different question:</p> <p>13 Would you agree that MyPillow uses the persona</p> <p>14 of Mike Lindell as a marketing strategy?</p> <p>15 A. I wouldn't say it's a strategy.</p> <p>16 Q. Does MyPillow use the image of Mike Lindell to</p> <p>17 help sell products?</p> <p>18 MS. OLIVER: Objection to form.</p> <p>19 You can answer.</p> <p>20 A. He is the brand of MyPillow.</p> <p>21 BY MS. WRIGLEY:</p> <p>22 Q. Okay. And you would agree Mike Lindell is the</p> <p>23 most important salesperson from MyPillow and its products?</p> <p>24 MS. OLIVER: Objection to form.</p> <p>25 You can answer.</p>	<p style="text-align: right;">Page 59</p> <p>1 printed that goes through, sort of, a chronology with</p> <p>2 Mike's story.</p> <p>3 Do you see that?</p> <p>4 A. Yes.</p> <p>5 Q. Do you see that that his story starts in 1977?</p> <p>6 A. Yes.</p> <p>7 Q. With the beginning, and then 1980, it</p> <p>8 describes an entrepreneurial path.</p> <p>9 Do you see that?</p> <p>10 A. Yes.</p> <p>11 Q. And 2004, it describes developing the pillow.</p> <p>12 Do you see that?</p> <p>13 A. Yes.</p> <p>14 Q. In 2004, it also has a title, "Perfect Timing"</p> <p>15 and sort of gives some additional information about the</p> <p>16 story of Mike Lindell and MyPillow?</p> <p>17 A. Yes.</p> <p>18 Q. And if you go forward, do you see it goes to</p> <p>19 2005, and it has a title, "On the Road," and again</p> <p>20 continues the story with Mike Lindell and MyPillow.</p> <p>21 Do you see that?</p> <p>22 A. Yes.</p> <p>23 Q. And then, if you go forward to 2011, it</p> <p>24 continues the story of Mike Lindell and MyPillow called --</p> <p>25 with a title, "Success in Print."</p>
<p style="text-align: right;">Page 58</p> <p>1 A. I personally think so. I don't know.</p> <p>2 BY MS. WRIGLEY:</p> <p>3 Q. I'm going to show you another document. You</p> <p>4 can put that one to the side.</p> <p>5 (Whereupon, Exhibit 407 was marked.)</p> <p>6 BY MS. WRIGLEY:</p> <p>7 Q. The court reporter is handing to you what's</p> <p>8 been marked as Exhibit 407.</p> <p>9 I'll represent for the record, again, this is</p> <p>10 another printout from the MyPillow website. At the bottom</p> <p>11 left-hand corner has information regarding the place and</p> <p>12 the website this was printed from, along with the</p> <p>13 information that appeared at this point at this particular</p> <p>14 time, and this is a printout of the information that</p> <p>15 appears, if you go to, sort of, the bottom of the home</p> <p>16 page, it's got a number of links. And if you go to the</p> <p>17 last page of this document, you'll see kind of like a site</p> <p>18 map, and it's got store links and information links. This</p> <p>19 printout represents the information that appears in the</p> <p>20 "About Us" section of the website.</p> <p>21 Do you see that one sort of underlined on this</p> <p>22 last page?</p> <p>23 A. Yes.</p> <p>24 Q. Okay. If you go back to the first page, just</p> <p>25 take a minute to flip through. This is information</p>	<p style="text-align: right;">Page 60</p> <p>1 Do you see that?</p> <p>2 A. Yes.</p> <p>3 Q. It continues to 2011, "Unscripted: MyPillow's</p> <p>4 First Infomercial."</p> <p>5 Do you see that?</p> <p>6 A. Yes.</p> <p>7 Q. In 2012, it continues the story, "QVC Debut."</p> <p>8 Do you see that?</p> <p>9 A. Yes.</p> <p>10 Q. If you go forward, in 2012 it talks about,</p> <p>11 "MyPillow Expands."</p> <p>12 Do you see that?</p> <p>13 A. Yes.</p> <p>14 Q. And then, in 2014, it says, "Radio."</p> <p>15 Do you see that?</p> <p>16 A. Yes.</p> <p>17 Q. Okay. And you, in the course of your</p> <p>18 employment with -- in marketing with MyPillow, you've</p> <p>19 dealt with, sort of, marketing in connection with</p> <p>20 radio stations for MyPillow; correct?</p> <p>21 A. Yes.</p> <p>22 Q. Okay. And then, if you continue, in 2016, it</p> <p>23 talks, again, about Mike's story, and it has the heading,</p> <p>24 "Mike J. Lindell, an American Dream."</p> <p>25 Do you see that?</p>

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<p style="text-align: right;">Page 61</p> <p>1 A. Yes.</p> <p>2 Q. And it talks about a documentary that</p> <p>3 Mike Lindell created.</p> <p>4 Do you see that?</p> <p>5 A. Yes.</p> <p>6 Q. About his success story?</p> <p>7 A. Yes.</p> <p>8 Q. And then, if you go forward, this one just</p> <p>9 goes up to 2021, and it says, "MyPillow Today."</p> <p>10 Do you see that?</p> <p>11 A. Yes.</p> <p>12 Q. And it says, "Today MyPillow has 15 retail</p> <p>13 locations, has been featured in many news articles and</p> <p>14 employs over 1,600 people and has sold over 15 million</p> <p>15 pillows."</p> <p>16 Do you see that?</p> <p>17 A. Yes.</p> <p>18 Q. And you've been with the company a long time,</p> <p>19 so you've been with the company for a number of these, I</p> <p>20 guess, milestones and a MyPillow story; correct?</p> <p>21 A. Yes.</p> <p>22 Q. Okay. Based on your work at MyPillow for the</p> <p>23 last 10 years, would you agree that Mr. Lindell has good</p> <p>24 marketing instincts?</p> <p>25 MS. OLIVER: Objection to form.</p>	<p style="text-align: right;">Page 63</p> <p>1 A. Yes.</p> <p>2 BY MS. WRIGLEY:</p> <p>3 Q. And why do you say yes?</p> <p>4 A. Media, the radio. We have great talent that</p> <p>5 we work with in radio and podcasters that help sell the</p> <p>6 product.</p> <p>7 Q. And does Mike Lindell have strong</p> <p>8 relationships with any of -- many of those media and</p> <p>9 podcasters that help sell the MyPillow products?</p> <p>10 A. I don't know his relationship with all of</p> <p>11 them.</p> <p>12 Q. Okay. Okay. What are some of the -- well, as</p> <p>13 you sit here today, who are the radio, podcaster or</p> <p>14 influencers who have helped sell the most MyPillow</p> <p>15 products in the last 10 years?</p> <p>16 A. Don Imus was our first one who did the best,</p> <p>17 rest his soul.</p> <p>18 THE REPORTER: I'm sorry?</p> <p>19 A. Rest his soul. He's passed. Jack Posobiec,</p> <p>20 an influencer, Alex Jones, Steve Bannon.</p> <p>21 BY MS. WRIGLEY:</p> <p>22 Q. You referenced Don Imus, Jack --</p> <p>23 A. Posobiec.</p> <p>24 Q. -- Posobiec, Alex Jones and Steve Bannon;</p> <p>25 correct?</p>
<p style="text-align: right;">Page 62</p> <p>1 You can answer.</p> <p>2 A. Yes.</p> <p>3 BY MS. WRIGLEY:</p> <p>4 Q. Would you agree that Mike Lindell, at least</p> <p>5 based on your experience with MyPillow in the last</p> <p>6 10 years, has made decisions with respect to marketing</p> <p>7 MyPillow that have been effective in increasing sales of</p> <p>8 the MyPillow products?</p> <p>9 A. He has great products, and so that's what</p> <p>10 we've made some money off of that.</p> <p>11 Q. Do you think that Mike Lindell does a good job</p> <p>12 of marketing the MyPillow products?</p> <p>13 A. Yes.</p> <p>14 Q. Would you agree that Mr. Lindell is very</p> <p>15 knowledgeable about the best ways to market and sell</p> <p>16 MyPillow's products?</p> <p>17 MS. OLIVER: Objection to form.</p> <p>18 You can answer.</p> <p>19 A. Yes.</p> <p>20 BY MS. WRIGLEY:</p> <p>21 Q. Based on your experience, does Mike Lindell</p> <p>22 know how to use media platforms to help sell products of</p> <p>23 MyPillow?</p> <p>24 MS. OLIVER: Objection to form.</p> <p>25 You can answer.</p>	<p style="text-align: right;">Page 64</p> <p>1 A. Correct.</p> <p>2 Q. Anyone else that comes to mind?</p> <p>3 A. They have the biggest platform. That's why</p> <p>4 they sell so much.</p> <p>5 Q. I want to continue to ask you some questions</p> <p>6 about marketing MyPillow, and I want to focus on the years</p> <p>7 2020 and 2021.</p> <p>8 You had a fair amount of responsibility for</p> <p>9 marketing MyPillow products during that time; correct?</p> <p>10 A. Yes.</p> <p>11 Q. During that period of time, who else at</p> <p>12 MyPillow would have had marketing responsibilities,</p> <p>13 besides yourself?</p> <p>14 A. We have people that do text messages and email</p> <p>15 blasts, which would be Nick Dressen.</p> <p>16 THE REPORTER: What?</p> <p>17 A. Nick Dressen, D-R-E-S-S-E-N.</p> <p>18 BY MS. WRIGLEY:</p> <p>19 Q. So Mr. Dressen works for MyPillow, and he does</p> <p>20 text and email blasts for the company?</p> <p>21 A. Yes.</p> <p>22 Q. Okay. Just explain to me, or just for the</p> <p>23 record, what do you mean by text or email blasts?</p> <p>24 A. Promoting a specific product, a flash sale on</p> <p>25 slippers or towels.</p>

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<p style="text-align: right;">Page 65</p> <p>1 Q. What is Mr. Dressen's position at the company?</p> <p>2 A. I don't know his title.</p> <p>3 Q. Okay. Anybody else that has a main marketing</p> <p>4 role or responsibility at MyPillow during 2020 and 2021,</p> <p>5 besides yourself, Mr. Dressen?</p> <p>6 A. Jessica Maskovich is still CMO, and she did --</p> <p>7 she handles the TV commercials.</p> <p>8 Q. Okay. When you say, "Handles the TV</p> <p>9 commercials," what do you mean?</p> <p>10 A. She helps create the commercials.</p> <p>11 Q. Does she write scripts for those commercials?</p> <p>12 A. Yes.</p> <p>13 Q. Does she do anything else besides writing</p> <p>14 scripts for the commercials?</p> <p>15 A. Not to my knowledge.</p> <p>16 Q. Do you have any responsibility for the TV</p> <p>17 commercials?</p> <p>18 A. None.</p> <p>19 Q. Who decides when or where to air those TV</p> <p>20 commercials at MyPillow?</p> <p>21 A. I don't know. I don't have anything to do</p> <p>22 with the TV commercials.</p> <p>23 Q. Okay. Does anybody else, besides</p> <p>24 Jessica Maskovich, have responsibility for the TV</p> <p>25 commercials at MyPillow?</p>	<p style="text-align: right;">Page 67</p> <p>1 else employed by MyPillow have any main responsibilities</p> <p>2 for marketing, besides the individuals we just went</p> <p>3 through?</p> <p>4 A. No.</p> <p>5 Q. Okay. In your position at marketing in the</p> <p>6 last 10 years, have you had any responsibilities for</p> <p>7 marketing budgets or expenditures?</p> <p>8 A. No.</p> <p>9 Q. What about for building brand awareness?</p> <p>10 A. No.</p> <p>11 Q. Do you develop brand strategies in your</p> <p>12 position at MyPillow?</p> <p>13 A. We do not brand.</p> <p>14 Q. What do you mean by that?</p> <p>15 A. We don't use it just to brand.</p> <p>16 Q. In your position in marketing at MyPillow, do</p> <p>17 you have any involvement or responsibility for developing</p> <p>18 or giving feedback on any marketing plans?</p> <p>19 A. No.</p> <p>20 Q. Does MyPillow create any marketing plans or</p> <p>21 strategies?</p> <p>22 A. No.</p> <p>23 Q. Who decides what type of marketing MyPillow is</p> <p>24 going to do to sell its products?</p> <p>25 A. I don't know. I'm not in a marketing meeting.</p>
<p style="text-align: right;">Page 66</p> <p>1 A. I don't know.</p> <p>2 Q. Okay. Are you familiar with an individual</p> <p>3 named Joe Schmieg or Schmieg?</p> <p>4 A. Joe Schmieg, yes.</p> <p>5 Q. Does Mr. Schmieg work at MyPillow?</p> <p>6 A. Yes.</p> <p>7 Q. What is his position?</p> <p>8 A. I don't know his exact title.</p> <p>9 Q. Do you work with him, at all?</p> <p>10 A. Yes.</p> <p>11 Q. What's the nature of your interactions with</p> <p>12 Mr. Schmieg?</p> <p>13 A. He does some retail stores. He's a</p> <p>14 salesperson. I don't know his exact title, like I said,</p> <p>15 and he's worked with a few of the radio stations.</p> <p>16 Q. What has been his work with the radio stations</p> <p>17 been?</p> <p>18 A. The same as mine; marketing, adding new</p> <p>19 radio stations for advertising purposes.</p> <p>20 Q. How long has he worked for MyPillow?</p> <p>21 A. I don't know.</p> <p>22 Q. And does Mike Lindell have marketing</p> <p>23 responsibilities at the company?</p> <p>24 A. He is -- I don't know. I mean, I guess.</p> <p>25 Q. Does anybody else at the company or anybody</p>	<p style="text-align: right;">Page 68</p> <p>1 I just handle radio, podcasters and influencers, so I</p> <p>2 don't know.</p> <p>3 Q. Do you have any responsibilities in connection</p> <p>4 with your job at MyPillow for organizing promotional</p> <p>5 events?</p> <p>6 A. Not events. Just promotions on products.</p> <p>7 Q. Okay. Okay. Do you have any responsibilities</p> <p>8 in your position at MyPillow to develop and manage</p> <p>9 advertisements or commercials for MyPillow?</p> <p>10 A. No.</p> <p>11 Q. Do you have any responsibilities for posting</p> <p>12 social media content for MyPillow?</p> <p>13 A. No.</p> <p>14 Q. Do you know who at -- well, does anybody at</p> <p>15 MyPillow have responsibility for posting social media?</p> <p>16 A. Yes, Heidi O'Donnell.</p> <p>17 Q. Who?</p> <p>18 A. Heidi O'Donnell.</p> <p>19 Q. What is her position at MyPillow?</p> <p>20 A. I don't know her title. She does</p> <p>21 social media. That's all I know.</p> <p>22 Q. Do you have any responsibilities in your</p> <p>23 position at marketing for managing social media in any</p> <p>24 way?</p> <p>25 A. No.</p>

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<p style="text-align: right;">Page 69</p> <p>1 Q. Monitoring social media in any way?</p> <p>2 A. No.</p> <p>3 Q. How about managing any other online content?</p> <p>4 A. No.</p> <p>5 Q. Okay. You said a number of times that you</p> <p>6 worked with radio, podcasters and influencers. Let me</p> <p>7 just make sure I understand what you mean.</p> <p>8 When you say "radio," what do you mean by</p> <p>9 "radio"?</p> <p>10 A. So a specific, say, WOR in New York, they want</p> <p>11 to bring on a talent to advertise MyPillow products, so</p> <p>12 that's who I work with, the talent and the station.</p> <p>13 Q. And what is the nature of your interactions</p> <p>14 with the radio station in, sort of, setting up an</p> <p>15 arrangement when they want to work with MyPillow?</p> <p>16 A. I get them a couple products because we want</p> <p>17 them to use the products so they know what they're talking</p> <p>18 about when they're promoting the product, give them a</p> <p>19 pillow and some sheets, and then they -- we send them a</p> <p>20 script, and they do a 60-second spot on the actual</p> <p>21 product.</p> <p>22 Q. When you send them the script; is that a</p> <p>23 script that you've developed or created?</p> <p>24 A. We give them an outline, but they make it</p> <p>25 their own.</p>	<p style="text-align: right;">Page 71</p> <p>1 Q. Okay. And what's the purpose of tracking the</p> <p>2 sales for specific stations each day?</p> <p>3 A. Because the station wants to know how good</p> <p>4 they're doing.</p> <p>5 Q. Okay. How does MyPillow -- strike that.</p> <p>6 Does MyPillow compensate the radio station for</p> <p>7 doing these advertisements?</p> <p>8 A. They get a percentage of the sales that come</p> <p>9 in.</p> <p>10 Q. What is the percentage?</p> <p>11 A. 25 percent.</p> <p>12 Q. Is it 25 percent for all radio stations?</p> <p>13 A. No.</p> <p>14 Q. Who decides what the percentage arrangement</p> <p>15 will be with respect to MyPillow and the radio stations?</p> <p>16 A. We started this probably six years ago, that</p> <p>17 they get a percentage, and Mike Lindell decided what they</p> <p>18 would get.</p> <p>19 Q. Okay. So each radio station that does, sort</p> <p>20 of, spots for MyPillow products receives compensation in</p> <p>21 the form of a percentage of the sales produced from the</p> <p>22 use of their unique promo codes?</p> <p>23 A. Not all of them. Some are a cash buy.</p> <p>24 Q. Okay. Do you have access to information at</p> <p>25 work that identifies, for each radio station, whether</p>
<p style="text-align: right;">Page 70</p> <p>1 Q. And does that script typically reference a</p> <p>2 promo code?</p> <p>3 A. Yes.</p> <p>4 Q. And that promo code would be unique to the</p> <p>5 radio station?</p> <p>6 A. Correct.</p> <p>7 Q. Okay. And do you track or monitor the</p> <p>8 performance of those spots for the particular</p> <p>9 radio station or entity?</p> <p>10 A. Yes.</p> <p>11 Q. How do you do that?</p> <p>12 A. A report that I get from our computer each</p> <p>13 morning.</p> <p>14 Q. Okay. What's this report that you get each</p> <p>15 morning?</p> <p>16 A. A sales-tracking email.</p> <p>17 Q. Who does the sales-tracking email come from?</p> <p>18 A. Our computer, Annaware.</p> <p>19 Q. What is Annaware?</p> <p>20 A. Just a program that we have on our computer</p> <p>21 that tracks our promo code usage.</p> <p>22 Q. Do you get an email with MyPillow sales</p> <p>23 delineated by promo code on a daily basis?</p> <p>24 A. I pull specific reports for specific stations</p> <p>25 each day, yes.</p>	<p style="text-align: right;">Page 72</p> <p>1 they're compensated from a percentage of sales or whether</p> <p>2 they're compensated from a cash buy?</p> <p>3 A. Yes.</p> <p>4 Q. Approximately how many radio stations does</p> <p>5 MyPillow have arrangements with for the radio stations to</p> <p>6 run MyPillow spots?</p> <p>7 A. Between radio, podcast and influencers, all of</p> <p>8 them?</p> <p>9 Q. Just radio. Just radio.</p> <p>10 A. Now, probably only 40.</p> <p>11 Q. 40 now.</p> <p>12 How about in 2020?</p> <p>13 A. Before COVID?</p> <p>14 Q. Yes, let's just say before COVID.</p> <p>15 A. Before COVID, probably 200.</p> <p>16 Q. 200.</p> <p>17 How about around the time of the</p> <p>18 Presidential Election in 2020?</p> <p>19 A. Pre-COVID, 200. I can't say. I don't know.</p> <p>20 Q. Okay.</p> <p>21 A. Because of COVID, they went down</p> <p>22 significantly.</p> <p>23 Q. Okay. Let me ask you about the numbers, and</p> <p>24 I'll circle back to radio podcasters.</p> <p>25 Currently, how many podcasters does</p>

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<p style="text-align: right;">Page 73</p> <p>1 Mike Lindell have arrangements with?</p> <p>2 A. I can't even -- I can't guess. Several.</p> <p>3 Podcasts have come alive lately in the last couple of</p> <p>4 years.</p> <p>5 Q. More than 10?</p> <p>6 A. Yes.</p> <p>7 Q. More than 100?</p> <p>8 A. Probably 100.</p> <p>9 Q. And let me ask you about influencers.</p> <p>10 Currently, approximately how many influencers</p> <p>11 does --</p> <p>12 A. 40.</p> <p>13 Q. Okay. Around the time of the 2020</p> <p>14 Presidential Election, how many podcasters would MyPillow</p> <p>15 have arrangements with?</p> <p>16 A. Podcast wasn't big then, so maybe 10.</p> <p>17 Q. Let me ask you that same question for</p> <p>18 influencers?</p> <p>19 A. 20, maybe.</p> <p>20 Q. Now, when I -- circling back to the radio and</p> <p>21 then how the radio is compensated, you said a cash buy.</p> <p>22 Can you explain to me what you mean by that?</p> <p>23 A. They get a certain dollar amount per spot that</p> <p>24 they do. If they do one spot per day, for instance, if</p> <p>25 they get \$1,000 per spot and they do one a day, it's --</p>	<p style="text-align: right;">Page 75</p> <p>1 Let me ask you about podcasters. Just so the</p> <p>2 record is clear, what do you mean by "podcaster"?</p> <p>3 A. Just a podcast. People -- it's like a</p> <p>4 streaming service.</p> <p>5 Q. Okay. And what are your responsibilities or</p> <p>6 the nature of your interactions with podcasters in</p> <p>7 connection with marketing for MyPillow?</p> <p>8 A. The same thing. They get a couple products,</p> <p>9 we give them the script, they do a 60 to a 120-spot, give</p> <p>10 out the promo code, drive them to our website.</p> <p>11 Q. How are podcasters compensated for doing the</p> <p>12 spots?</p> <p>13 A. 25 percent.</p> <p>14 Q. Are there cash buys for podcasters?</p> <p>15 A. I don't believe I have any cash buys.</p> <p>16 Q. In order for either the radio or the</p> <p>17 podcasters to get paid, MyPillow would have to keep</p> <p>18 records or track the sales of MyPillow products that have</p> <p>19 been produced through the promo codes of each; correct?</p> <p>20 A. Correct.</p> <p>21 Q. How often does radio or the podcasters sort of</p> <p>22 get paid for their MyPillow sales?</p> <p>23 A. Usually monthly, every four weeks.</p> <p>24 Q. Are there invoices associated with the payment</p> <p>25 of the radio and the podcasters?</p>
<p style="text-align: right;">Page 74</p> <p>1 that's what they get paid. Two a day, \$2,000.</p> <p>2 Q. Okay. And then, the other way that they get</p> <p>3 paid is a percentage of the sales of MyPillow products</p> <p>4 that they bring in from the use of their promo codes?</p> <p>5 A. Correct.</p> <p>6 Q. Okay. And I think you said, typically, it's a</p> <p>7 25 percent percentage?</p> <p>8 A. Correct.</p> <p>9 Q. Are there a number of radio stations that</p> <p>10 receive more than 25 percent?</p> <p>11 A. No.</p> <p>12 Q. Okay. Are there a number of them that receive</p> <p>13 less?</p> <p>14 A. No.</p> <p>15 Q. Okay. All of them get --</p> <p>16 A. No one receives less.</p> <p>17 Q. Okay. So do all of the radio stations -- and</p> <p>18 I'll ask you during the period of 2020 to 2023 -- receive</p> <p>19 25 percent of any sales that come in from spots or promos</p> <p>20 that they run for MyPillow?</p> <p>21 A. So they're either a cash buy or a percentage.</p> <p>22 Q. Okay. And the percentage is always</p> <p>23 25 percent?</p> <p>24 A. Correct.</p> <p>25 Q. Okay. Thank you. So that's -- that's radio.</p>	<p style="text-align: right;">Page 76</p> <p>1 A. Yes.</p> <p>2 Q. Okay. Who prepares the invoices?</p> <p>3 A. Some by the station, some by myself.</p> <p>4 Q. Okay. Does MyPillow keep records of the</p> <p>5 invoices regardless of who prepares them?</p> <p>6 A. Yes.</p> <p>7 Q. Okay. Who keeps those records?</p> <p>8 A. Accounting.</p> <p>9 Q. Okay. And does the radio stations or the</p> <p>10 podcasters, do they always have the same promo code, or do</p> <p>11 they use a variety of promo codes, even if they're unique</p> <p>12 to them?</p> <p>13 A. They just normally use one.</p> <p>14 Q. One, okay. Makes it easy to track; right?</p> <p>15 A. Yes.</p> <p>16 Q. Okay. Let me ask about influencers.</p> <p>17 What are the influencers?</p> <p>18 A. People that post on social media.</p> <p>19 Q. Okay.</p> <p>20 A. Their promo code.</p> <p>21 Q. And what are your responsibilities in your</p> <p>22 role with marketing at MyPillow for influencers?</p> <p>23 A. The same with the radio station or a podcast.</p> <p>24 Some people will post a meme of MyPillow products with</p> <p>25 their promo code on it, and that's how they get people to</p>

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<p style="text-align: right;">Page 77</p> <p>1 go purchase our products.</p> <p>2 Q. And how does the arrangements initiate between</p> <p>3 MyPillow and influencers?</p> <p>4 A. They reach out to MyPillow and ask if they can</p> <p>5 be an influencer.</p> <p>6 Q. Who makes the decision about whether a</p> <p>7 particular person or entity can be an influencer for</p> <p>8 MyPillow?</p> <p>9 A. I do.</p> <p>10 Q. Okay. And what do you take into account when</p> <p>11 deciding a person or entity would be an influencer for</p> <p>12 MyPillow?</p> <p>13 A. I, basically, let anyone be an influencer</p> <p>14 unless they're derogatory or swearing a bunch.</p> <p>15 Q. And then, do you keep records or keep track of</p> <p>16 all the different, sort of, people or entities that are</p> <p>17 influencers for MyPillow products?</p> <p>18 A. Yes.</p> <p>19 Q. Okay. And where do you keep those records?</p> <p>20 A. On my computer.</p> <p>21 Q. Okay. Is it in a -- what type of computer</p> <p>22 program is it? Like an Excel or --</p> <p>23 A. They all have an Excel sheet.</p> <p>24 Q. They all have an Excel sheet. Got it.</p> <p>25 Okay. And then, how are the influencers</p>	<p style="text-align: right;">Page 79</p> <p>1 what they did or didn't do.</p> <p>2 Q. Okay. And then, do you give them feedback or</p> <p>3 any information that they can use to try to increase</p> <p>4 sales?</p> <p>5 A. Yes.</p> <p>6 Q. Typically, what would be the nature of that</p> <p>7 feedback?</p> <p>8 A. By changing up an offer because maybe one</p> <p>9 didn't do well. Maybe their viewers didn't want the</p> <p>10 pillow, maybe they wanted to talk about sheets.</p> <p>11 Q. How often do you interact with the radio,</p> <p>12 podcast and influencers in your job in marketing at</p> <p>13 MyPillow?</p> <p>14 A. I try and reach out at least once every two to</p> <p>15 three weeks to change up the offer.</p> <p>16 Q. Okay. Who are the -- I know I asked you</p> <p>17 about, sort of, the some of the top performers earlier.</p> <p>18 Are there any other, sort of, podcaster or</p> <p>19 influencers in the last couple years who have been, sort</p> <p>20 of, top performers in terms of selling MyPillow products?</p> <p>21 A. Just the ones that I stated.</p> <p>22 Q. Okay. Do you keep Mike Lindell regularly</p> <p>23 updated on the performance of the sale of MyPillow</p> <p>24 products from radio, podcasts and influencers?</p> <p>25 A. Yes.</p>
<p style="text-align: right;">Page 78</p> <p>1 compensated for any MyPillow products that they've sold?</p> <p>2 A. The same way a radio station and podcast is.</p> <p>3 Q. Are there any cash buys for the influencers?</p> <p>4 A. None.</p> <p>5 Q. Do the influencers get paid with revenue</p> <p>6 splits?</p> <p>7 A. They get the 25 percent.</p> <p>8 Q. Okay.</p> <p>9 A. That's our revenue split, 75/25.</p> <p>10 Q. So any MyPillow products that an influencer</p> <p>11 might sell with their own promo code, their compensation</p> <p>12 would be 25 percent of the revenue of sale of MyPillow</p> <p>13 products that were bought using that code?</p> <p>14 A. Correct.</p> <p>15 Q. And they get, sort of, paid monthly, just like</p> <p>16 the radio or the podcasters?</p> <p>17 A. Yes.</p> <p>18 Q. Okay. And in connection with your job at</p> <p>19 marketing or MyPillow, do you regularly assess the</p> <p>20 performance of the radio, podcaster or influencers?</p> <p>21 A. Yes.</p> <p>22 Q. Okay. And what's the purpose of that</p> <p>23 assessment?</p> <p>24 A. Because if they're normally doing \$10,000 a</p> <p>25 week and they go down to \$200, I reach out to them and ask</p>	<p style="text-align: right;">Page 80</p> <p>1 Q. How often do you keep him up-to-date?</p> <p>2 A. Every morning, Monday through Friday.</p> <p>3 Q. Okay. Do you have discussions with</p> <p>4 Mike Lindell about the performance of the sale of MyPillow</p> <p>5 products from radio, podcast and influencers?</p> <p>6 A. Yes.</p> <p>7 Q. Okay. What are -- typically, what are the</p> <p>8 nature of those discussions?</p> <p>9 A. I look for deviations. Like I said, if</p> <p>10 somebody's doing \$10,000 a week and they go down to \$200,</p> <p>11 I reach out to them.</p> <p>12 Q. Got it.</p> <p>13 And does Mr. Lindell ever give you any</p> <p>14 feedback for the radio, podcasts or influencers?</p> <p>15 A. Rarely.</p> <p>16 Q. Do you have a good sense, after your years of</p> <p>17 marketing experience at MyPillow, about the ways in which</p> <p>18 are to be more effective at selling MyPillow products via</p> <p>19 radio, podcast and influencers?</p> <p>20 A. Yes.</p> <p>21 Q. Okay. And what would your assessment be of,</p> <p>22 sort of, the best ways to sell MyPillow products through</p> <p>23 radio, podcast or influencers?</p> <p>24 A. I think it depends on the station. Like I</p> <p>25 said, if they're selling more pillows or sheets, or</p>

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<p style="text-align: right;">Page 81</p> <p>1 depends on the demographic, possibly.</p> <p>2 Q. Currently, in 2023, which avenue is more</p> <p>3 effective at selling MyPillow products between radio,</p> <p>4 podcaster or influencers?</p> <p>5 A. Probably podcasters right now.</p> <p>6 Q. What about in, sort of, in 2020, around the</p> <p>7 time of Presidential Election; was there, sort of, one of</p> <p>8 these vehicles between radio, podcaster or influencers</p> <p>9 that was the most effective in terms of selling MyPillows?</p> <p>10 A. Pretty much same across the board.</p> <p>11 Q. Okay. Who is the number one podcasters right</p> <p>12 now, as we sit here today, in terms of helping to sell</p> <p>13 MyPillow products?</p> <p>14 A. To be honest, if I -- some are -- have radio</p> <p>15 and podcast, so I would say Alex Jones.</p> <p>16 Q. And Alex Jones is sort of associated with</p> <p>17 Infowars; is that right?</p> <p>18 A. Yes.</p> <p>19 Q. Okay. In terms of the promo codes for radio,</p> <p>20 sort of, podcasters and influencers, once they get</p> <p>21 assigned a promo code, how does MyPillow keep track of</p> <p>22 which code goes with each of the radio influencers or</p> <p>23 podcasters?</p> <p>24 A. On the spreadsheets.</p> <p>25 Q. You keep a spreadsheet of all of them?</p>	<p style="text-align: right;">Page 83</p> <p>1 Q. What about weekly?</p> <p>2 A. Yes.</p> <p>3 Q. How about month -- how about annually?</p> <p>4 A. Yes.</p> <p>5 Q. Okay. And let's go even more granular.</p> <p>6 How about on a day-to-day basis by hour?</p> <p>7 A. Yes.</p> <p>8 Q. Are you able to figure out what products a</p> <p>9 particular promo code is being used to buy?</p> <p>10 A. I have that ability, yes.</p> <p>11 Q. Okay. So you can do it by product, as well?</p> <p>12 A. Yes.</p> <p>13 Q. How far back does the information go at</p> <p>14 MyPillow?</p> <p>15 A. I have no idea.</p> <p>16 Q. Okay. If I wanted to know what were the daily</p> <p>17 sales using a promo code for an Alex Jones podcast on a</p> <p>18 particular day in 2021, would you be able to pull that</p> <p>19 information from your sales-tracking system, Annaware?</p> <p>20 A. Yes.</p> <p>21 Q. And if I -- and how long would that take?</p> <p>22 A. It depends, the date range.</p> <p>23 Q. Okay. If I wanted to pull the daily sales for</p> <p>24 a particular podcast promo code for 2021, how long would</p> <p>25 it take you to pull that information from Annaware?</p>
<p style="text-align: right;">Page 82</p> <p>1 A. Each one has their own individual one, yes.</p> <p>2 Q. Okay. Okay. And do the codes get input into</p> <p>3 any sort of any electronic platforms or systems?</p> <p>4 A. They're in my sales-tracking system, Annaware.</p> <p>5 Q. Okay. Do you use a sales-tracking system</p> <p>6 called Annaware?</p> <p>7 A. Yes.</p> <p>8 Q. Okay. And what is Annaware, just for the</p> <p>9 people at home?</p> <p>10 A. I have no idea. I have no idea. You have to</p> <p>11 ask the IT department.</p> <p>12 Q. Okay. Describe for me what you use the</p> <p>13 sales-tracking system for in connection with your job at</p> <p>14 MyPillow.</p> <p>15 A. To track sales for promo codes.</p> <p>16 Q. What type of sales information do you have</p> <p>17 available to do your job through Annaware?</p> <p>18 A. The same thing I just said; just to track</p> <p>19 sales using the promo codes for each person.</p> <p>20 Q. Okay. Can you identify the sales that have --</p> <p>21 that came in for a particular promo code on a daily basis?</p> <p>22 A. I have the capability, yes.</p> <p>23 Q. Okay. And are you able to get information on</p> <p>24 the sales for a particular promo code on a monthly basis?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 84</p> <p>1 A. The same amount. If you're just doing one</p> <p>2 day, it's going to take 30 seconds. If you have a larger</p> <p>3 range, it's going to take, you know, 20 minutes.</p> <p>4 Q. Got it. Got it. Okay.</p> <p>5 Does that sales-tracking system also indicate,</p> <p>6 sort of, the amount of revenue split or the amount of</p> <p>7 money that was paid to a particular radio or podcaster or</p> <p>8 influencer for their sales?</p> <p>9 A. No.</p> <p>10 Q. Okay. Is there another system that tracks,</p> <p>11 sort of, payments or compensation?</p> <p>12 A. I have to plug that in, and then I take</p> <p>13 25 percent to pay them.</p> <p>14 Q. Got it. Okay.</p> <p>15 So you use the Annaware, the sales-tracking</p> <p>16 system, to identify, sort of, the total revenue from a</p> <p>17 promo code for a radio, influencer or podcast to kind of</p> <p>18 identify how much they get paid for the revenue split?</p> <p>19 A. Yes.</p> <p>20 Q. Okay. And then, do you create invoices in</p> <p>21 some cases?</p> <p>22 A. In some cases.</p> <p>23 Q. Okay. And then, those invoices, do they get</p> <p>24 sent to anyone?</p> <p>25 A. Accounting.</p>

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<p style="text-align: right;">Page 85</p> <p>1 Q. Accounting, okay.</p> <p>2 And does accounting, then, pay the radio, the</p> <p>3 influencer or the podcast?</p> <p>4 A. Yes.</p> <p>5 Q. Okay. I think I've seen in documents a system</p> <p>6 called Magneto, is that --</p> <p>7 A. Magento.</p> <p>8 Q. Magento. Maybe I'm thinking X-men, I guess.</p> <p>9 Magento.</p> <p>10 Are you familiar with a program or a system</p> <p>11 called Magento?</p> <p>12 A. That's our web system.</p> <p>13 Q. What is the web system?</p> <p>14 A. Our website, Magento.</p> <p>15 Q. Do you use Magento in connection with your job</p> <p>16 in marketing at MyPillow?</p> <p>17 A. Very little.</p> <p>18 Q. Okay. What have you used it for?</p> <p>19 A. To create a promo code.</p> <p>20 Q. And what do you mean by "create a promo code"?</p> <p>21 A. To set up a promo code for my podcasters,</p> <p>22 radio stations, influencers.</p> <p>23 Q. Okay. What's the purpose of putting --</p> <p>24 creating a promo code within that system?</p> <p>25 A. So it works on the website when a consumer</p>	<p style="text-align: right;">Page 87</p> <p>1 seeing different spots that they use.</p> <p>2 Do you maintain those scripts or spots in a</p> <p>3 location for work?</p> <p>4 A. I have some, yes, on my desktop.</p> <p>5 Q. Is there any sort of central shared place that</p> <p>6 those are maintained that other people at MyPillow have</p> <p>7 access to?</p> <p>8 A. I would imagine IT has access to it.</p> <p>9 Q. Okay.</p> <p>10 A. It's not on a shared server or anything.</p> <p>11 Q. Okay. And I think you had said you write</p> <p>12 scripts.</p> <p>13 Do you do any sort of audio or video in</p> <p>14 connection with radio, podcast or influencer spots?</p> <p>15 A. No.</p> <p>16 Q. Okay. Do you ever sort of create any memes or</p> <p>17 graphs that influencers use online?</p> <p>18 A. Yes.</p> <p>19 Q. Okay. And do you maintain those on your</p> <p>20 computer, as well.</p> <p>21 A. They're on the computer, yes.</p> <p>22 Q. And do you have responsibility for approving</p> <p>23 some of them that the influencers use to sell MyPillow</p> <p>24 products?</p> <p>25 A. They have to be -- if they created their own,</p>
<p style="text-align: right;">Page 86</p> <p>1 wants to use it.</p> <p>2 Q. Got it.</p> <p>3 So any radio, podcaster or influencer who has</p> <p>4 a promo code, that promo code has to get, sort of,</p> <p>5 inputted or implemented into the website system in order</p> <p>6 for it to be actually be used on the website by a</p> <p>7 consumer?</p> <p>8 A. Correct.</p> <p>9 Q. Okay. And who -- are you the one that has the</p> <p>10 responsibility for inputting that, or is there anybody</p> <p>11 else at MyPillow who does that?</p> <p>12 A. I do it, and my assistant occasionally does</p> <p>13 it.</p> <p>14 Q. Okay. And then, can you obtain information</p> <p>15 from Magento about all of the different, sort of,</p> <p>16 promo codes that are used on the website or that have been</p> <p>17 inputted to be used on the website?</p> <p>18 A. That system goes to Annaware where I can pull</p> <p>19 the sales.</p> <p>20 Q. Okay. So the two systems are kind of</p> <p>21 connected in some way?</p> <p>22 A. Yes.</p> <p>23 Q. Got it. Got it. Okay.</p> <p>24 What about -- I know you had talked about for</p> <p>25 radio, podcasters, influencers kind of creating scripts or</p>	<p style="text-align: right;">Page 88</p> <p>1 they have to be approved.</p> <p>2 Q. And who does that approval?</p> <p>3 A. Myself or Mike.</p> <p>4 Q. Okay. And just like for radio and podcasts,</p> <p>5 do you maintain records in terms of the revenue or sales</p> <p>6 from MyPillow products associated with a promo code for</p> <p>7 the influencers?</p> <p>8 A. Can you repeat the question?</p> <p>9 Q. Yes.</p> <p>10 Just like for radio or podcast, do you</p> <p>11 maintain records, or do you have information that</p> <p>12 identifies the revenue or sales for MyPillow products</p> <p>13 associated with a promo code --</p> <p>14 A. Yes.</p> <p>15 Q. -- used by an influencer?</p> <p>16 A. Yes.</p> <p>17 Q. Okay. And then, do they get, sort of, paid in</p> <p>18 the same way we just discussed?</p> <p>19 A. Yes.</p> <p>20 Q. Okay. I know we had talked about assessing</p> <p>21 the performance of them, and you said you looked for</p> <p>22 deviations or potentially declines in the sales.</p> <p>23 Do you have any kind of benchmarks or standard</p> <p>24 measures that you use for ROI in assessing the performance</p> <p>25 of promo codes for radio, podcasters or influencers?</p>

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<p style="text-align: right;">Page 89</p> <p>1 A. Yes, if they're a cash buy, they need to hit a</p> <p>2 1.8 ROI.</p> <p>3 Q. If it's a cash buy, it's a 1.8 ROI --</p> <p>4 THE REPORTER: If it's a what?</p> <p>5 MS. WRIGLEY: I'm sorry.</p> <p>6 BY MS. WRIGLEY:</p> <p>7 Q. If it's a cash buy, it's a 1.8 ROI; is that</p> <p>8 correct?</p> <p>9 A. Return on investment.</p> <p>10 Q. So in laymen's terms -- and I'm going to use</p> <p>11 very small dollars -- if they paid -- if you paid them</p> <p>12 2 dollars to run a MyPillow promo, you would want them to</p> <p>13 have sales of at least 1.8 times the 2 dollars?</p> <p>14 A. Correct.</p> <p>15 Q. What about for the 25 percent split for</p> <p>16 revenue; is there sort of a benchmark for an ROI on that?</p> <p>17 A. No.</p> <p>18 Q. Is that because it's sort of based upon --</p> <p>19 it's a percentage based upon what's made?</p> <p>20 A. That's correct.</p> <p>21 Q. Okay. Do you ever decide -- have you ever</p> <p>22 made, in the last couple years, any decisions to</p> <p>23 discontinue or eliminate a radio, podcaster or influencers</p> <p>24 that had, like, very low performance of sales?</p> <p>25 A. I believe I've removed five, maybe, because</p>	<p style="text-align: right;">Page 91</p> <p>1 page is Bates DEF030740, second page 030742, third</p> <p>2 page 030744, fourth page 030746, final page, 030748.</p> <p>3 And just for the record, this document has</p> <p>4 been marked "confidential and AEO," and so any portion of</p> <p>5 this transcript about the document should be designated</p> <p>6 accordingly at this point in time.</p> <p>7 (The following testimony was designated</p> <p>8 as Confidential/Attorneys' Eyes Only.)</p> <p>9 BY MS. WRIGLEY:</p> <p>10 Q. Ms. Curtis, have you ever looked at any profit</p> <p>11 and loss or P&L statements for MyPillow in connection with</p> <p>12 your work at the company?</p> <p>13 A. No.</p> <p>14 Q. Okay. I'm going to ask you one question, and</p> <p>15 maybe we'll move on.</p> <p>16 If you look down at the very left-hand column</p> <p>17 of this, there's a row that says, "Gross Profit," and</p> <p>18 then, under there, it says, "Expense," and there's a</p> <p>19 number of expense accounts listed on the very left.</p> <p>20 Do you see where I'm at? It says, "Gross</p> <p>21 Profit Expense," and there's some sub-accounts right to</p> <p>22 the right of "Expense."</p> <p>23 A. Okay. Yes.</p> <p>24 Q. And then, if I go a few lines down, it says,</p> <p>25 "5100-advertising/promotional."</p>
<p style="text-align: right;">Page 90</p> <p>1 they had no sales in two years.</p> <p>2 Q. Who are the five?</p> <p>3 A. I can't say for sure.</p> <p>4 Q. Okay. Any of them come to mind?</p> <p>5 A. No.</p> <p>6 Q. Any other decisions like that to remove radio,</p> <p>7 podcaster or influencers because of promos that aren't</p> <p>8 performing well?</p> <p>9 A. No.</p> <p>10 Q. Okay. Ms. Curtis, are you good? Do you want</p> <p>11 to take a break?</p> <p>12 A. I'm fine.</p> <p>13 Q. Okay. I'm going to mark another exhibit.</p> <p>14 Just give me two seconds.</p> <p>15 (Whereupon, Exhibit 408 was marked.)</p> <p>16 BY MS. WRIGLEY:</p> <p>17 Q. Ms. Curtis, I'm handing to you what's been</p> <p>18 marked as Exhibit 408, and I'll represent these are</p> <p>19 documents produced by MyPillow in this case.</p> <p>20 They are P&L statements for a number of years.</p> <p>21 The first page has 2018, the second page has 2019, third</p> <p>22 page of this document's got 2020, the fourth page has</p> <p>23 2021, the fifth page has 2022.</p> <p>24 MS. WRIGLEY: The Bates Number -- this</p> <p>25 is just for the record, for the court reporter. The first</p>	<p style="text-align: right;">Page 92</p> <p>1 Do you see that?</p> <p>2 A. Yes.</p> <p>3 Q. And then, every month there's sort of a</p> <p>4 certain amount of money represented as an expense line</p> <p>5 item for advertising and promotional, and there's one from</p> <p>6 January.</p> <p>7 And then, each of the rows -- I'm sorry,</p> <p>8 strike that -- each of the columns represents a month of</p> <p>9 2018, and then, on the far right, the last column is a</p> <p>10 total, which is the expense amount for the year.</p> <p>11 Do you sort of see how that works?</p> <p>12 A. Yes.</p> <p>13 Q. And I'm just looking at the advertising and</p> <p>14 the promotional one, and in the first column, it's</p> <p>15 January 2018, it's got a number 8,279,897.68.</p> <p>16 Do you see that amount?</p> <p>17 A. Yes.</p> <p>18 Q. And then, for February, it's sort of over</p> <p>19 7 million.</p> <p>20 Do you see that?</p> <p>21 A. Yes.</p> <p>22 Q. For March, it's over 7 million.</p> <p>23 Do you see that?</p> <p>24 A. Yes.</p> <p>25 Q. And then, it kind of continues, and then, if I</p>

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<p style="text-align: right;">Page 93</p> <p>1 go all the way to, sort of, December of 2018, do you see</p> <p>2 it's over 24 -- I'm sorry, over 23, almost 24 million?</p> <p>3 A. Yes.</p> <p>4 Q. Okay. And then, if you kind of go to the next</p> <p>5 page, do you see you've got a P&L from 2019, and if you go</p> <p>6 a little bit down a few rows, it has sort of that similar</p> <p>7 expense line item for advertising and promotional that,</p> <p>8 sort of, is broken out by month for 2018.</p> <p>9 Do you see that?</p> <p>10 A. Yes.</p> <p>11 Q. And for 2019, the expense line item, in</p> <p>12 January, starts as over 4 million, and then by -- and</p> <p>13 then, December, it has a different amount for every month,</p> <p>14 and in December, it has about over 14 million for</p> <p>15 December.</p> <p>16 Do you see that?</p> <p>17 A. Yes.</p> <p>18 Q. And then, 2019, the total is over 82 million.</p> <p>19 Do you see that?</p> <p>20 A. Yes.</p> <p>21 Q. Okay. And then, there's sort of a similar P&L</p> <p>22 and a similar expense item in 2020 on the next page of the</p> <p>23 document, and then so on for 2021 and 2022.</p> <p>24 Do you see that?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 95</p> <p>1 how much is spent per year by MyPillow to use radio,</p> <p>2 podcaster or influencers to advertise the products?</p> <p>3 A. No idea.</p> <p>4 Q. Okay. Who at the company is responsible for</p> <p>5 tracking that information?</p> <p>6 A. I would imagine the accountant has it.</p> <p>7 Q. Who's the accountant at MyPillow?</p> <p>8 A. Our controller is Michael Thomas.</p> <p>9 Q. Michael Thomas, okay.</p> <p>10 Do you ever have any conversations with</p> <p>11 Mike Lindell about, sort of, the amount of money that's</p> <p>12 sort of going out or being paid to radio, podcasters or</p> <p>13 influencers to do promos for MyPillow products?</p> <p>14 A. No.</p> <p>15 Q. Do you know whether, in the last couple</p> <p>16 years -- let me ask you this:</p> <p>17 Do you know whether MyPillow is spending more</p> <p>18 on radio, podcasters or influencers in 2023 than it was in</p> <p>19 2020?</p> <p>20 A. I don't know. I would have to look.</p> <p>21 Q. Okay. Do you keep track of or monitor or</p> <p>22 assess that information in any way in your job at</p> <p>23 MyPillow?</p> <p>24 A. No.</p> <p>25 Q. Okay. Do you know anybody that does?</p>
<p style="text-align: right;">Page 94</p> <p>1 Q. Are you -- in connection with your job in</p> <p>2 marketing at MyPillow, do you have any responsibilities</p> <p>3 for kind of like monitoring the expense amount for any</p> <p>4 advertising or promotional efforts?</p> <p>5 A. No.</p> <p>6 Q. Okay. Do you have any -- in terms of cash</p> <p>7 buys or percentage of revenue paid for, like, radio,</p> <p>8 podcast and influencers, do you have any budget or expense</p> <p>9 amounts you can't exceed in terms of paying those entities</p> <p>10 to promote MyPillow?</p> <p>11 A. No.</p> <p>12 Q. Okay. Do you report on the amount of money</p> <p>13 that's going out to those entities at MyPillow in any way?</p> <p>14 A. No.</p> <p>15 Q. Do you keep track of the amount of money in</p> <p>16 any way?</p> <p>17 A. I would imagine it's on a spreadsheet, but I</p> <p>18 do not give that to anybody.</p> <p>19 Q. Do you have a sense, like for this year, for</p> <p>20 instance, in 2023, the amount of money that MyPillow has</p> <p>21 paid to radio, podcaster or influencers either through</p> <p>22 cash buys or revenue splits or promoting or selling</p> <p>23 MyPillow products?</p> <p>24 A. No.</p> <p>25 Q. Do you know approximately, like on average,</p>	<p style="text-align: right;">Page 96</p> <p>1 A. No.</p> <p>2 Q. Okay. We can move on from that. Thank you.</p> <p>3 MS. WRIGLEY: We might do one more</p> <p>4 document, and then potentially take a break because the</p> <p>5 court reporter has to switch the -- the videographer has</p> <p>6 to switch the tape.</p> <p>7 How many minutes do you have?</p> <p>8 THE VIDEOGRAPHER: About 15.</p> <p>9 MS. WRIGLEY: Okay. Good, good.</p> <p>10 (Whereupon, Exhibit 409 was marked.)</p> <p>11 (The following testimony was designated</p> <p>12 as Confidential/Attorneys' Eyes Only.)</p> <p>13 BY MS. WRIGLEY:</p> <p>14 Q. Ms. Curtis, I'm handing you to you what's been</p> <p>15 marked as Exhibit 409. I'll represent these are documents</p> <p>16 produced by MyPillow in this litigation.</p> <p>17 MS. WRIGLEY: Again, for the transcript</p> <p>18 or the record, this exhibit has been -- these documents,</p> <p>19 and now this exhibit, has been marked by the defendants in</p> <p>20 this action as "Confidential and AEO," and so should be</p> <p>21 designated as such within this transcript.</p> <p>22 BY MS. WRIGLEY:</p> <p>23 Q. Just for the record, you have in front of you</p> <p>24 a report or a document produced that has a heading,</p> <p>25 "MyPillow, Inc., Sales By Customer Summary."</p>

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<p style="text-align: right;">Page 97</p> <p>1 The first one in this exhibit is</p> <p>2 January through December of 2018. It has a Bates Stamped</p> <p>3 DEF030750.</p> <p>4 And, Ms. Curtis, when I say, "Bates Stamp,"</p> <p>5 just so you know, it's the number at the very, sort of,</p> <p>6 bottom right hand of the document.</p> <p>7 A. Yes.</p> <p>8 Q. The second one in this collection has a -- is</p> <p>9 a number of pages in, and it's got the Bates Stamp of</p> <p>10 030751, and it is a similar document, "Sales by</p> <p>11 Customer Summary for 2019." There's also one for</p> <p>12 2020 with a Bates Number 030752. There's another one</p> <p>13 for 2021 with the Bates Number 030753, and that should</p> <p>14 be it.</p> <p>15 Have you ever seen -- are you familiar with</p> <p>16 this type of document from your work at MyPillow?</p> <p>17 A. No.</p> <p>18 Q. Okay. Looking at this document -- and I'm</p> <p>19 just looking at the first one from 2018, do you see that</p> <p>20 there's a number of customers listed that track sales by</p> <p>21 customer and then it sort of continues for a number of</p> <p>22 pages?</p> <p>23 A. Yes.</p> <p>24 Q. And the first one listed here is Telebrands</p> <p>25 Corporation; correct?</p>	<p style="text-align: right;">Page 99</p> <p>1 products at MyPillow, do you currently have any</p> <p>2 responsibilities with retailers?</p> <p>3 A. None.</p> <p>4 Q. Okay. Who at the company primarily deals with</p> <p>5 retailers who sell MyPillow products?</p> <p>6 A. Joe Schmieg.</p> <p>7 Q. Okay. And then, would it have been</p> <p>8 Mr. Schmieg during the years 2018 up through present?</p> <p>9 A. Joe Schmieg or Brad Carlson.</p> <p>10 Q. Okay. And do you have any promo code work</p> <p>11 associated with retailers that carry MyPillow?</p> <p>12 A. No.</p> <p>13 Q. Okay. Let's take a break.</p> <p>14 (The Confidential/Attorneys' Eyes Only</p> <p>15 testimony concluded.)</p> <p>16 MS. WRIGLEY: We're going to take a</p> <p>17 break now.</p> <p>18 THE VIDEOGRAPHER: We're going off the</p> <p>19 record at 10:46 a.m. This concludes Media Unit Number 1.</p> <p>20 (Whereupon, a recess was taken from</p> <p>21 10:46 a.m. to 10:58 a.m.)</p> <p>22 (Whereupon, Exhibit 410 was marked.)</p> <p>23 THE VIDEOGRAPHER: We are going back on</p> <p>24 the record. The time now is 10:58 a.m. This is the</p> <p>25 beginning of Media Unit Number 2.</p>
<p style="text-align: right;">Page 98</p> <p>1 A. Yes.</p> <p>2 Q. Second one listed is QVC, Inc.; correct?</p> <p>3 A. Yes.</p> <p>4 Q. Third one listed is Bed Bath & Beyond;</p> <p>5 correct?</p> <p>6 A. Yes.</p> <p>7 Q. Next one is Kohl's Pre-EDI.</p> <p>8 Do you see that?</p> <p>9 A. Yes.</p> <p>10 Q. And then, kind of so on, and the list</p> <p>11 continues for sort of a number of pages.</p> <p>12 Do you see that?</p> <p>13 A. Yes.</p> <p>14 Q. Are you familiar with any of these, just even</p> <p>15 looking at the first page, any of these customers from</p> <p>16 your work at MyPillow?</p> <p>17 A. I don't deal with them, but I know of them,</p> <p>18 yes.</p> <p>19 Q. Okay. And are these sort of retail customers</p> <p>20 that would carry MyPillow products for sale?</p> <p>21 MS. OLIVER: Objection to form.</p> <p>22 But you can answer.</p> <p>23 A. At one time, yes.</p> <p>24 BY MS. WRIGLEY:</p> <p>25 Q. Okay. In connection with retailers who sell</p>	<p style="text-align: right;">Page 100</p> <p>1 BY MS. WRIGLEY:</p> <p>2 Q. Ms. Curtis, I have placed in front of you the</p> <p>3 next exhibit. It's been marked as Exhibit 410. The Bates</p> <p>4 Stamp for this document is DEF080781, and, actually, you</p> <p>5 can see it's spiral-bound because it has a number of</p> <p>6 pages.</p> <p>7 If you look at that Bates Number at the bottom</p> <p>8 right-hand corner, it has .000001.</p> <p>9 Do you see the 1?</p> <p>10 A. Yes.</p> <p>11 Q. And then, actually, as you go through the</p> <p>12 pages, if I could direct your attention to a particular</p> <p>13 page number, that will be the number we're going to use,</p> <p>14 and it goes from 1, and this one goes all the way to 203.</p> <p>15 Do you see that?</p> <p>16 A. Yes.</p> <p>17 Q. Okay. And just for the record, this is sort</p> <p>18 of a document Defendants have produced.</p> <p>19 If I look at the top of this, do you see that</p> <p>20 there's sort of a box that says, "Dawn, Garry," has a</p> <p>21 Number 1-952-913-8557.</p> <p>22 Do you see that?</p> <p>23 A. Yes.</p> <p>24 Q. And is that your phone number?</p> <p>25 A. Yes.</p>

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<p style="text-align: right;">Page 101</p> <p>1 Q. Okay. And then the "Dawn" is a reference to 2 yourself; correct? 3 A. Yes. 4 Q. "Garry," what is that a reference to? 5 A. My husband. 6 Q. Do you share a phone? 7 A. No. That's how Mike put us in the phone. 8 Q. Got it. 9 So Mr. Lindell would have that number appear 10 as "Dawn, Garry," yourself and then your husband; correct? 11 A. Correct. 12 Q. And then, if you look to the right, do you see 13 there's a box that says "Mike Lindell"? 14 A. Yes. 15 Q. And then, do you recognize that to be his 16 phone number? 17 A. Yes. 18 Q. And there's sort of another box below the one 19 that has your name it that says MI -- strike that -- 20 mlicloud@mypillow.com. 21 Do you see that? 22 A. Yes. 23 Q. Do you recognize what that is? 24 A. No. 25 Q. Okay. If I look at the top of this sort of</p>	<p style="text-align: right;">Page 103</p> <p>1 texts from Mr. Lindell to yourself? 2 A. It seems to be. 3 Q. Okay. And looking at the first one, it says, 4 "Dawn," and right below there, there's a time 5 "12:04:31 p.m." 6 Do you see that? 7 A. Yes. 8 Q. And then, below there, he says, "How did 9 Promo Code SCOTT do..?" And that's at 12:43:30 p.m. 10 Do you see that? 11 A. Yes. 12 Q. And then, if you go to the left side, do you 13 see there's a response? 14 A. Yes. 15 Q. The response has above it "Dawn, Garry"? 16 A. Yes. 17 Q. And that would be a text response from you to 18 Mr. Lindell? 19 A. Yes. 20 Q. And you said, "Only did \$250, and no 21 book sales." 22 And that was at 12:43 p.m.; correct? 23 A. Correct. 24 Q. Okay. And just looking at this first text, 25 are these the sort of types or interactions or</p>
<p style="text-align: right;">Page 102</p> <p>1 printout, the date of the first text or message in this 2 document is March 13, 2020. 3 Do you see that? 4 A. Yes. 5 Q. Okay. And then, just to flip all the way to 6 the end, so we can identify for the record the Bates range 7 for this sort of production of messages or texts that were 8 made, if you go to page 202, but then continues on 203, do 9 you see that the last entry or text in Exhibit 410 is 10 January 6, 2021? 11 A. Yes. 12 Q. Okay. And looking at Exhibit 410, do you 13 recognize these to be texts between you and Mike Lindell 14 during the period of time of March 13, 2020 through a 15 point in time on January 6, 2021? 16 A. Seems to be, yes. 17 Q. Okay. And if you look at the first one, I 18 just want to walk through these a little bit, you can see, 19 on the right-hand side, it says, "Device Owner," and it's 20 got sort of two messages and on the left-hand side a 21 response. 22 Do you see that? 23 A. Yes. 24 Q. And so, just to orient ourselves with the 25 document on the right-hand side, do those appear to be the</p>	<p style="text-align: right;">Page 104</p> <p>1 communications over text that you and Mr. Lindell would 2 have related to promo code use? 3 A. Yes. 4 Q. Okay. And then, if you sort of look through 5 Exhibit 410, does it appear that you and Mr. Lindell -- or 6 does this reflect that you and Mike Lindell text regularly 7 with respect to the performance of different, sort of, 8 radio, podcaster, influencers in connection with the sale 9 of MyPillow products? 10 A. Yes. 11 Q. Okay. And did you and Mr. Lindell text 12 regularly about the performance of those entities in 13 connection with selling MyPillow products? 14 A. Yes. 15 Q. And those entities would have sold MyPillow 16 products with the use of a promo code; correct? 17 A. Yes. 18 Q. Okay. And you would have texted with 19 MyPillow -- I'm sorry -- texted with Mr. Lindell about the 20 use of promo codes by radio, podcast or influencers in the 21 year 2020; correct? 22 A. Yes. 23 Q. And would you have regularly texted with him 24 about the use of promo codes by radio, podcast or 25 influencers in 2021, 2022 and continuing through present</p>

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<p style="text-align: right;">Page 105</p> <p>1 in 2023?</p> <p>2 A. Yes.</p> <p>3 Q. Okay. And if I turn to the second page, and I</p> <p>4 want to go to a text that you sent Mr. Lindell on</p> <p>5 March 16th, 2020.</p> <p>6 Do you see there's, sort of in the middle</p> <p>7 there, there's sort of a box there under your -- under,</p> <p>8 "Dawn, Garry"?</p> <p>9 A. Yes.</p> <p>10 Q. And listed in that box, it includes, "Hannity,</p> <p>11 \$47,100. Week prior, \$53,900."</p> <p>12 Do you see that?</p> <p>13 A. Yes.</p> <p>14 Q. Under there, it says, "Beck, bad week,</p> <p>15 \$14,000. Week prior, \$26,000."</p> <p>16 Do you see that?</p> <p>17 A. Yes.</p> <p>18 Q. The next line, "Gallagher, \$12,700. Week</p> <p>19 prior, \$13,400."</p> <p>20 Do you see that?</p> <p>21 A. Yes.</p> <p>22 Q. The next line, "Rick & Bubba, \$4,700. Week</p> <p>23 prior, \$5,400."</p> <p>24 Do you see that?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 107</p> <p>1 Q. Both. Okay.</p> <p>2 And at this time, in 2020, he was promoting</p> <p>3 MyPillow product with a promo code that would then --</p> <p>4 where the promo code was then being used by consumers to</p> <p>5 buy MyPillow products?</p> <p>6 A. Yes.</p> <p>7 Q. Okay. And the same would be for the next</p> <p>8 line, which starts with "Beck"?</p> <p>9 A. Yes.</p> <p>10 Q. And what's "Beck" a reference to?</p> <p>11 A. Glenn Beck.</p> <p>12 Q. And that would have been his sort of radio,</p> <p>13 podcast or influencer sale?</p> <p>14 A. Yes.</p> <p>15 Q. Okay. And then, just to back up a little bit,</p> <p>16 do you -- would you delineate sort of Sean Hannity or</p> <p>17 Glenn Beck in any of those categories -- radio, podcaster</p> <p>18 or influencer? Like, do you consider one to be radio</p> <p>19 versus podcast or influencer, or are they just kind of all</p> <p>20 in that group?</p> <p>21 A. They're all in that group.</p> <p>22 Q. Okay. Okay. And then the next one listed is</p> <p>23 "Gallagher."</p> <p>24 What is that a reference to?</p> <p>25 A. Mike Gallagher.</p>
<p style="text-align: right;">Page 106</p> <p>1 Q. Next line, "Boston, \$5,100. Week prior,</p> <p>2 \$4,100."</p> <p>3 Do you see that?</p> <p>4 A. Yes.</p> <p>5 Q. And then, at the very bottom, it has a time</p> <p>6 you sent that text, "4:35 p.m."</p> <p>7 Do you see that?</p> <p>8 A. Yes.</p> <p>9 Q. Can you explain to me what this information is</p> <p>10 that you're sending Mike Lindell in the text?</p> <p>11 A. Their weekly sales.</p> <p>12 Q. And so, does that number for Hannity at the</p> <p>13 top reflect weekly sales of MyPillow products identified</p> <p>14 by a promo code associated with Hannity?</p> <p>15 A. Yes.</p> <p>16 Q. And what's the reference to "Hannity"?</p> <p>17 A. That's his promo code, Sean Hannity's</p> <p>18 promo code.</p> <p>19 Q. And is Sean Hannity a, sort of, radio</p> <p>20 podcaster and influencer?</p> <p>21 A. Radio.</p> <p>22 Q. Okay.</p> <p>23 A. And a podcast.</p> <p>24 Q. That is Mr. Hannity's radio or podcast?</p> <p>25 A. Both.</p>	<p style="text-align: right;">Page 108</p> <p>1 Q. Mike Gallagher is sort of another radio,</p> <p>2 podcast, influencer?</p> <p>3 A. Yes.</p> <p>4 Q. "Rick & Bubba" is next.</p> <p>5 Do you see that?</p> <p>6 A. Yes.</p> <p>7 Q. Rick & Bubba is another radio, podcast,</p> <p>8 influencer promoting or selling MyPillow products?</p> <p>9 A. Yes.</p> <p>10 Q. And then the next one is "Boston."</p> <p>11 What's Boston?</p> <p>12 A. iHeart Boston.</p> <p>13 Q. iHeart Boston. Okay.</p> <p>14 And again, each of these would have their own</p> <p>15 promo codes for the use or sale of MyPillow products?</p> <p>16 A. Yes.</p> <p>17 Q. Got it. Okay.</p> <p>18 And then, you report the weekly sales to</p> <p>19 Mike Lindell for each of them?</p> <p>20 A. Yes.</p> <p>21 Q. And then, on this day, March 16th, 2020 at</p> <p>22 4:35 p.m., would this be the totality of radio, podcast,</p> <p>23 influencers, or did you -- would you have just sent</p> <p>24 Mike Lindell a selection of them?</p> <p>25 A. Just a selection.</p>

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<p style="text-align: right;">Page 109</p> <p>1 Q. Okay. And what would the -- why would you</p> <p>2 have sent a selection versus the performance of all of</p> <p>3 them?</p> <p>4 A. Because these were the biggest ones that we</p> <p>5 had at the time.</p> <p>6 Q. Okay. And so, would you typically text or</p> <p>7 report to Mike Lindell on a daily basis, sort of, the</p> <p>8 largest or the biggest radio, influencer, podcasters in</p> <p>9 terms of sales of MyPillow products?</p> <p>10 A. More than likely, yes.</p> <p>11 Q. Okay. And then, you can see in response to</p> <p>12 that message, Mr. Lindell responds back a couple minutes</p> <p>13 later at 4:37 p.m.</p> <p>14 Do you see that?</p> <p>15 A. Yes.</p> <p>16 Q. He says, "Tell them that Beck and Hannity were</p> <p>17 a disaster."</p> <p>18 Do you see that?</p> <p>19 A. Yes.</p> <p>20 Q. What would that have been a reference to?</p> <p>21 A. That he was expecting their sales to be</p> <p>22 better.</p> <p>23 Q. He then says, in the next text at 4:37,</p> <p>24 "We need extra reads."</p> <p>25 What would that be a reference to?</p>	<p style="text-align: right;">Page 111</p> <p>1 spots did they give us on the weekend?"</p> <p>2 Do you see that?</p> <p>3 A. Yes.</p> <p>4 Q. And you responded at 4:39, "6 pre-recorded</p> <p>5 spots for each."</p> <p>6 Do you see that?</p> <p>7 A. Yes.</p> <p>8 Q. And what would be a reference to,</p> <p>9 "6 pre-recorded spots for each"?</p> <p>10 A. I can't say for sure, but I'm guessing they</p> <p>11 gave us 6 extra spots.</p> <p>12 Q. Okay. And when you say "spots," would that</p> <p>13 just be a commercial or advertisement for MyPillow?</p> <p>14 A. Just a 60-second commercial --</p> <p>15 Q. Got it.</p> <p>16 A. -- for MyPillow that they pre-recorded.</p> <p>17 Q. Okay. And when you say, "They pre-recorded,"</p> <p>18 is this sort of a recording from the radio, the podcaster</p> <p>19 influencer, they're doing sort of their own, sort of,</p> <p>20 advertisement?</p> <p>21 A. Sean Hannity goes into the studio and creates</p> <p>22 a MyPillow spot.</p> <p>23 Q. Got it.</p> <p>24 You don't send them, like, the pre-recorded</p> <p>25 spots?</p>
<p style="text-align: right;">Page 110</p> <p>1 A. I would imagine because their spend was much</p> <p>2 higher than the sales that they brought in.</p> <p>3 Q. Got it.</p> <p>4 And then, you responded, and that's on the</p> <p>5 next page, page 3, "Calling them now."</p> <p>6 Do you see that?</p> <p>7 A. Yes.</p> <p>8 Q. And would you have called them?</p> <p>9 A. Their rep, yes.</p> <p>10 Q. Okay. And who would the rep for Beck and</p> <p>11 Hannity be?</p> <p>12 A. Emily Freeborn.</p> <p>13 Q. And what organization is she with?</p> <p>14 A. iHeart.</p> <p>15 Q. iHeart, okay.</p> <p>16 And what would you have discussed with them?</p> <p>17 A. That they need to give us some free spots to</p> <p>18 make good.</p> <p>19 Q. Got it.</p> <p>20 And is that because they're not getting the</p> <p>21 ROI in terms of what MyPillow was spending with them to</p> <p>22 sell the products?</p> <p>23 A. That is correct.</p> <p>24 Q. Got it. Okay.</p> <p>25 And then, Mr. Lindell responded back, "What</p>	<p style="text-align: right;">Page 112</p> <p>1 A. They create their own pre-recorded spots.</p> <p>2 Q. Okay. And then, do you approve those</p> <p>3 pre-recorded spots, or can they just sort of record and</p> <p>4 put on whatever they want?</p> <p>5 A. They're usually approved first.</p> <p>6 Q. Okay. Got it. Got it. Okay.</p> <p>7 So let's look at just, sort of, another one as</p> <p>8 an example, and I'll have you maybe flip through to</p> <p>9 page 5.</p> <p>10 At the bottom, you sent a text at 11:36 a.m.</p> <p>11 on March 19th, 2020.</p> <p>12 Do you see that?</p> <p>13 A. Page 5?</p> <p>14 Q. Page 5.</p> <p>15 A. In 2019? I'm sorry, yes. 2020, yes.</p> <p>16 Q. That's okay.</p> <p>17 A. Sorry.</p> <p>18 Q. And you sent him a report of the weekly sales</p> <p>19 performance for some of the radio, podcast, influencers at</p> <p>20 this time; correct?</p> <p>21 A. Yes.</p> <p>22 Q. This lists Hannity, Beck, Rick & Bubba,</p> <p>23 Boston, Gallagher, and Gorka.</p> <p>24 Do you see that?</p> <p>25 A. Yes.</p>

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<p style="text-align: right;">Page 113</p> <p>1 Q. The first one is Hannity listed for \$7,100.</p> <p>2 "ONELIVE last Wednesday, \$6,800, ONELIVE."</p> <p>3 Do you see that?</p> <p>4 A. Yes.</p> <p>5 Q. What is that line ONELIVE a reference to?</p> <p>6 A. ONELIVE read.</p> <p>7 Q. What does that mean?</p> <p>8 A. Not a pre-recorded spot. He did it live</p> <p>9 within his show.</p> <p>10 Q. Okay. Got it.</p> <p>11 And then, if you look at Beck, Beck's got zero</p> <p>12 dollars. It says, "Not one sale. I double-checked,</p> <p>13 nothing ran. Last Wednesday, \$1,200, nothing ran."</p> <p>14 Would that be a reference to Beck didn't do</p> <p>15 any sales for MyPillow that week?</p> <p>16 A. That day.</p> <p>17 Q. That day. Got it.</p> <p>18 So the numbers here would be sales from that</p> <p>19 particular day you sent this report?</p> <p>20 A. Or the day before, yes.</p> <p>21 Q. Or the day before. Got it. Got it.</p> <p>22 And so, sort of at any point in time during</p> <p>23 the day, can you figure out what the daily or the weekly</p> <p>24 sales are for a particular podcast influencer or radio?</p> <p>25 A. I can, yes.</p>	<p style="text-align: right;">Page 115</p> <p>1 Q. Okay. And what about Rick & Bubba?</p> <p>2 A. They have their own show down in Mississippi</p> <p>3 called the Rick & Bubba Show.</p> <p>4 Q. What about Boston?</p> <p>5 A. iHeart Boston.</p> <p>6 Q. And then Eric Metaxas?</p> <p>7 A. He also has a show on Salem Media.</p> <p>8 Q. Got it.</p> <p>9 Then for Eric Metaxas, it's got, "\$2,000, did</p> <p>10 \$1,100 in one day, checking on an air check. Week prior,</p> <p>11 \$1,300."</p> <p>12 Do you see that?</p> <p>13 A. Yes.</p> <p>14 Q. The reference to checking on an air check,</p> <p>15 what does that refer to?</p> <p>16 A. I want to hear his spot to see what he did.</p> <p>17 Q. Okay. And so, that's an air check you were</p> <p>18 going to listen to?</p> <p>19 A. Yes.</p> <p>20 Q. Got it.</p> <p>21 And where do you get access to, sort of, the</p> <p>22 spots to do the checks or listen to them?</p> <p>23 A. I'd have to reach out to Salem to get an air</p> <p>24 check.</p> <p>25 Q. Okay. They would send it to you, you'd watch</p>
<p style="text-align: right;">Page 114</p> <p>1 Q. Okay. And so, at any point during the day,</p> <p>2 you could figure out who are the top performers; correct?</p> <p>3 A. Yes.</p> <p>4 Q. Got it. Let's sort of look at another one,</p> <p>5 just as an example.</p> <p>6 If you go to page 7, you sent a text to</p> <p>7 Mike Lindell on March 23rd, 2020 at 12:42 p.m.</p> <p>8 Are you with me?</p> <p>9 A. Yes.</p> <p>10 Q. And do you see you have listed, "Hannity,</p> <p>11 Beck, Gallagher, Gorka, Rick & Bubba, Boston,</p> <p>12 Eric Metaxas."</p> <p>13 Do you see that?</p> <p>14 A. Yes.</p> <p>15 Q. And would these have been -- would the numbers</p> <p>16 represented for each of them have been weekly sales?</p> <p>17 A. Looks like it, yes.</p> <p>18 Q. And I think I had asked you previously about</p> <p>19 Hannity, Beck, and Gallagher, but what's the reference to</p> <p>20 Gorka?</p> <p>21 Who's Gorka?</p> <p>22 A. Dr. Sebastian Gorka.</p> <p>23 Q. And where does he have a show or a podcast?</p> <p>24 A. He has a radio show on Salem Media. I don't</p> <p>25 know where they air it.</p>	<p style="text-align: right;">Page 116</p> <p>1 it?</p> <p>2 A. I would listen to it, yes.</p> <p>3 Q. Okay. And then, what would you -- what would</p> <p>4 be the purpose of you listening to it?</p> <p>5 A. Sometimes I have people that say they did a</p> <p>6 wrong offer. Our call center said they did a "buy one/get</p> <p>7 one free" when it's not a "buy one/get one free." I need</p> <p>8 to hear air checks from specific stations for those</p> <p>9 reasons.</p> <p>10 Q. Got it. Got it. All right.</p> <p>11 And then, if I go to the next one, the next</p> <p>12 text that you sent Mr. Lindell on the next day,</p> <p>13 March 24th, 2020, and this one's at 11:51 a.m.</p> <p>14 Do you see where I'm at?</p> <p>15 A. Where am I?</p> <p>16 Q. Same page.</p> <p>17 A. Oh, okay.</p> <p>18 Q. Page 7, sort of the next one. It lists</p> <p>19 Hannity, Beck, Gallagher, Rick & Bubba, and Boston again.</p> <p>20 Do you see that?</p> <p>21 A. Yes.</p> <p>22 Q. On the first line for Hannity, it says,</p> <p>23 "\$3,800, nothing ran. Last Monday, \$4,500, nothing ran."</p> <p>24 Do you see that?</p> <p>25 A. Yes.</p>

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<p style="text-align: right;">Page 117</p> <p>1 Q. Now, in the text before, those were sort of</p> <p>2 weekly numbers?</p> <p>3 A. Yes.</p> <p>4 Q. And then, typically, when you do weekly, do</p> <p>5 you kind of mention, like, it's weak?</p> <p>6 A. Yes.</p> <p>7 Q. Okay. And then, this one, the number's a</p> <p>8 little bit lower from that prior text for Hannity, for</p> <p>9 instance, on March 23rd when you reported it at 12:42. It</p> <p>10 was \$34,300, and then, in this following text, on</p> <p>11 March 24th, it was \$3,800.</p> <p>12 Do you see that?</p> <p>13 A. Yes.</p> <p>14 Q. And that's now like a daily number; correct?</p> <p>15 A. That is correct.</p> <p>16 Q. And you say, "Nothing ran. Last Monday,</p> <p>17 \$4,500, nothing ran."</p> <p>18 What's that a reference to, "Nothing ran"?</p> <p>19 A. They did not have a spot run that day during</p> <p>20 their show.</p> <p>21 Q. Okay. But then, he has sales of \$3,800, so</p> <p>22 can you explain to me, is that because he's still getting</p> <p>23 sales from, sort of, like previous spots or promo codes?</p> <p>24 A. That is correct.</p> <p>25 Q. Okay. So the sales can kind of -- like, it</p>	<p style="text-align: right;">Page 119</p> <p>1 Q. And again, you list Hannity, Beck, Gallagher,</p> <p>2 Rick & Bubba, and Boston.</p> <p>3 Do you see that?</p> <p>4 A. Yes.</p> <p>5 Q. And it looks like these are daily numbers;</p> <p>6 correct?</p> <p>7 A. Yes.</p> <p>8 Q. You also mentioned below that text, "Last</p> <p>9 night's spike."</p> <p>10 Do you see that?</p> <p>11 A. Yes.</p> <p>12 Q. And then, if you go to the next page, do you</p> <p>13 see that you put an image into your text at 1:20 p.m.?</p> <p>14 Do you see that?</p> <p>15 A. Yes.</p> <p>16 Q. What is this an image of?</p> <p>17 A. The Magento chart.</p> <p>18 Q. Is this Magento from the website?</p> <p>19 A. Yes.</p> <p>20 Q. And what does this chart represent?</p> <p>21 A. The number of orders coming in.</p> <p>22 Q. Okay. And I know it's a little bit fuzzy, but</p> <p>23 if I look at this, at the top, it's kind of got a</p> <p>24 drop-down that says, "Last 24 hours."</p> <p>25 A. Yes.</p>
<p style="text-align: right;">Page 118</p> <p>1 wouldn't just be if you wanted to see the performance of a</p> <p>2 promo code, it's not just looking at the sales for that</p> <p>3 day. You have to look at, sort of, the sales overall for</p> <p>4 the promo code; right?</p> <p>5 A. That is correct.</p> <p>6 Q. Got it. Okay.</p> <p>7 Let's see. And the information that you're</p> <p>8 reporting, whether it be daily or weekly sales for each of</p> <p>9 these radio, podcast, influencers, where are you getting</p> <p>10 the number for these?</p> <p>11 A. From my Annaware report.</p> <p>12 Q. Okay. And then, you just go in and you're</p> <p>13 able to look at it in Annaware?</p> <p>14 A. Yes.</p> <p>15 Q. Okay. And then, do you type it in or do you,</p> <p>16 kind of, cut and paste it into the text?</p> <p>17 A. I type it in.</p> <p>18 Q. Type it in. Must be a fast texter. Okay.</p> <p>19 Let me just see if I want to ask you about another</p> <p>20 example.</p> <p>21 Let's flip to page 16, and I want to look at,</p> <p>22 sort of, the text on that page for April 8th, 2020, which</p> <p>23 is the second part of the page.</p> <p>24 Do you see you sent a text at 12:50 p.m.?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 120</p> <p>1 Q. And would you have, sort of, selected --</p> <p>2 A. It just is programmed.</p> <p>3 Q. Okay. Okay. So you can go to Magento and</p> <p>4 then say, "Okay, I want to see the sales for the last</p> <p>5 24 hours."</p> <p>6 A. It defaults to that.</p> <p>7 Q. Defaults to that.</p> <p>8 A. I never change it.</p> <p>9 Q. And are these sales, like, the default -- does</p> <p>10 it, sort of, detail -- default for, sort of, the entities</p> <p>11 you're responsible for; radio, podcast, influencers, in</p> <p>12 terms of sales?</p> <p>13 A. No, it's overall sales.</p> <p>14 Q. All sales --</p> <p>15 A. All sales.</p> <p>16 Q. -- from anywhere?</p> <p>17 A. Correct.</p> <p>18 Q. Got it.</p> <p>19 A. Excuse me, from the website.</p> <p>20 Q. From the website?</p> <p>21 A. From the website.</p> <p>22 Q. Got it.</p> <p>23 So customers could be going to the website</p> <p>24 from hearing about it on radio, podcast, and influencers;</p> <p>25 right?</p>

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<p>1 A. Yes.</p> <p>2 Q. They also could go to the website from hearing</p> <p>3 about it through commercials of MyPillow on, like, TV</p> <p>4 networks; correct?</p> <p>5 A. Correct.</p> <p>6 Q. Okay. So this doesn't delineate between, sort</p> <p>7 of, radio, podcast networks, and then maybe TV</p> <p>8 advertisements?</p> <p>9 A. No.</p> <p>10 Q. This is sort of the sales numbers overall?</p> <p>11 A. Exactly.</p> <p>12 Q. Okay. So this is the last 24 hours looking at</p> <p>13 the one that you sent at 1:20 p.m., and then it gives a</p> <p>14 graph of the total amount of sales by hour?</p> <p>15 A. Yes.</p> <p>16 Q. Okay. And then, you can see when there's</p> <p>17 spikes during the day; correct?</p> <p>18 A. Yes.</p> <p>19 Q. When you look at this information and you</p> <p>20 report and you send it to Mr. Lindell in a text when</p> <p>21 there's, like, a spike, what's the purpose of looking at</p> <p>22 the spike and reporting it?</p> <p>23 A. I'm just showing him a spike, and it could be</p> <p>24 because a TV commercial launched at a specific time.</p> <p>25 Q. Okay. And when you send these, do you have an</p>	<p>1 him.</p> <p>2 Q. Got it. Got it.</p> <p>3 So there's a revenue number, there's a tax</p> <p>4 number, there's a shipping number, and then there's a</p> <p>5 quantity number?</p> <p>6 A. Correct.</p> <p>7 Q. And then, you get this from the Magento</p> <p>8 website report?</p> <p>9 A. Yes.</p> <p>10 Q. Got it. Okay.</p> <p>11 Is there anything on Magento where you can get</p> <p>12 a report that shows a graph or numbers like these by a</p> <p>13 particular radio, podcaster, or influencer?</p> <p>14 A. Not to my knowledge, no.</p> <p>15 Q. Okay. Do you know what Mr. Lindell does with</p> <p>16 the information like this that you send with these sales</p> <p>17 spikes?</p> <p>18 A. No.</p> <p>19 MS. OLIVER: Objection to form.</p> <p>20 A. No, I do not.</p> <p>21 BY MS. WRIGLEY:</p> <p>22 Q. Do you ever discuss these sales spikes with</p> <p>23 Mr. Lindell?</p> <p>24 A. No, I do not.</p> <p>25 Q. Okay. Looking down on that same page, I'm on</p>
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<p>1 understanding of the reason behind the spike at the time?</p> <p>2 A. I do not.</p> <p>3 Q. Okay. You're just, sort of, reporting so that</p> <p>4 he's aware of big spikes in sales at a particular point in</p> <p>5 time during the day?</p> <p>6 A. Correct.</p> <p>7 Q. And that's information that, in 2020 and going</p> <p>8 forward, you regularly report to Mr. Lindell?</p> <p>9 A. Not just in 2020. All the time.</p> <p>10 Q. All the time. 2021, 2022, and 2023?</p> <p>11 A. Yes.</p> <p>12 Q. Got it. Okay.</p> <p>13 And if you look at this image -- and again, I</p> <p>14 know it's fuzzy -- you have, like, a total revenue number</p> <p>15 down there at the bottom --</p> <p>16 A. Yes.</p> <p>17 Q. -- below the chart, and that -- this one looks</p> <p>18 like it's over a million dollars.</p> <p>19 Do you see that?</p> <p>20 A. Yes.</p> <p>21 Q. And would that be on this date, at this time</p> <p>22 of 1:12, there had been a million dollars of sales of</p> <p>23 MyPillow products?</p> <p>24 A. I can't say for sure. I don't look at the</p> <p>25 numbers down below. I look at a spike, and I report it to</p>	<p>1 page 17, and I'm looking at a text that you sent on</p> <p>2 April 10th, 2020 at 11:55 a.m. You state, "Sales have not</p> <p>3 yet loaded into the station tracker. I just emailed</p> <p>4 Gary Nyquist."</p> <p>5 Do you see that?</p> <p>6 A. Yes.</p> <p>7 Q. What is the station tracker?</p> <p>8 A. Station tracker, that's where the Annaware</p> <p>9 reports go and plug in my radio station, the sales for</p> <p>10 that. So I can just -- I don't have to look through a</p> <p>11 whole list of promo codes. It -- I can put in the</p> <p>12 station, say iHeart Boston, and I can put that in, and it</p> <p>13 just gives me those sales.</p> <p>14 Q. Okay. Got it.</p> <p>15 And you can -- does it give you -- what period</p> <p>16 of time does it give you the sales information?</p> <p>17 A. I collect -- I select the date range.</p> <p>18 Q. Okay. You could do it for, like, a particular</p> <p>19 date?</p> <p>20 A. Yes.</p> <p>21 Q. Could you do it for, like, a week or a month</p> <p>22 as well?</p> <p>23 A. Yes.</p> <p>24 Q. Okay. And so, you're able to go into the</p> <p>25 system and identify the sales of MyPillow's products</p>

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<p style="text-align: right;">Page 125</p> <p>1 associated by a particular station versus doing it with a</p> <p>2 promo code?</p> <p>3 A. Yes.</p> <p>4 Q. Okay. So would that be true for, like,</p> <p>5 Sean Hannity?</p> <p>6 A. Yes, all of mine.</p> <p>7 Q. All of yours?</p> <p>8 A. Uh-huh.</p> <p>9 Q. Okay. Eric Metaxas, for instance, could you</p> <p>10 put him in?</p> <p>11 A. Yes.</p> <p>12 Q. Got it.</p> <p>13 Let's see, I might ask you -- page 71.</p> <p>14 Looking at page 71, do you see there's sort of a text on</p> <p>15 the right side at 2:31 a.m. and it's got, like, a</p> <p>16 screen -- or a snapshot and this one looks like it's from</p> <p>17 the Mike Lindell side of the text?</p> <p>18 A. Yes.</p> <p>19 Q. Do you see that?</p> <p>20 Looking at this sort of image in the snapshot</p> <p>21 he sent, what does this show or reflect?</p> <p>22 A. This is the Annaware report that shows sales</p> <p>23 for a specific promo code.</p> <p>24 Q. Got it.</p> <p>25 Mr. Lindell sent this to you; is that right?</p>	<p style="text-align: right;">Page 127</p> <p>1 Roll & GoAnywhere Pillow.</p> <p>2 Q. How do you know that?</p> <p>3 A. Because I create the promo codes, all the GO</p> <p>4 1 through 1,000.</p> <p>5 Q. Got it.</p> <p>6 The GO 1 through 1,000 are associated with</p> <p>7 what, again?</p> <p>8 A. The Roll & GoAnywhere commercial.</p> <p>9 Q. Got it.</p> <p>10 So the next one listed there, GO8, that's a</p> <p>11 Roll & Go commercial?</p> <p>12 A. That is correct.</p> <p>13 Q. The next one GORKA, what is GORKA associated</p> <p>14 with?</p> <p>15 A. Dr. Sebastian Gorka.</p> <p>16 Q. And he has his own promo code?</p> <p>17 A. Yes.</p> <p>18 Q. The next one is GREAT. What is GREAT</p> <p>19 associated with?</p> <p>20 A. I don't know.</p> <p>21 Q. The next two are HANNITY?</p> <p>22 A. Yes.</p> <p>23 Q. What are those a reference to?</p> <p>24 A. Sean Hannity.</p> <p>25 Q. The next two are HONEY; one is 6 and one is 8.</p>
<p style="text-align: right;">Page 126</p> <p>1 A. It looks like it, yes.</p> <p>2 Q. Okay. And then, looking at this Annaware</p> <p>3 report -- and again, I know it's fuzzy -- it has on the</p> <p>4 left-hand side, from this shot, a list of promo codes.</p> <p>5 Do you see that?</p> <p>6 A. Yes. Yes.</p> <p>7 Q. And then, to the right, it's got some numbers.</p> <p>8 So the first one is "GO66," and then it's got a "1."</p> <p>9 What does that 1 reflect?</p> <p>10 A. 1 order.</p> <p>11 Q. 1 order. And then going to the right it's got</p> <p>12 a Number 34999.</p> <p>13 What does that reflect?</p> <p>14 A. The sale on that one order.</p> <p>15 Q. Got it.</p> <p>16 And then, the next column, 150, what does that</p> <p>17 reflect?</p> <p>18 A. I can't say for sure, but it could be the</p> <p>19 discount.</p> <p>20 Q. Okay.</p> <p>21 A. I don't know.</p> <p>22 Q. And then, this promo code, GO66, looking at</p> <p>23 this, can you tell, like, what entity this promo code</p> <p>24 would be associated from?</p> <p>25 A. It came from a commercial, or</p>	<p style="text-align: right;">Page 128</p> <p>1 What is Honey?</p> <p>2 A. I don't know.</p> <p>3 Q. Okay. Is it sort of -- typically, there's a</p> <p>4 phrase or sort of a code that makes it easy to identify</p> <p>5 which radio, podcast or influencer is associated with it?</p> <p>6 A. Yeah, I know the majority of them off the top</p> <p>7 of my head.</p> <p>8 Q. Got it. Got it. Okay.</p> <p>9 What about the HOPE ones?</p> <p>10 A. That was TV commercial, but I can't remember</p> <p>11 which one it was.</p> <p>12 Q. Got it. Got it. Okay.</p> <p>13 And so, Mr. Lindell on this day when he sent</p> <p>14 you this text, would have, kind of, sent you a snapshot</p> <p>15 from, like, sales associated with promo codes from the</p> <p>16 Annaware.</p> <p>17 Do you see that?</p> <p>18 A. Yes.</p> <p>19 Q. And then, you responded back at 2:32 a.m.</p> <p>20 Do you see that?</p> <p>21 A. Yes.</p> <p>22 Q. Texting late in the night?</p> <p>23 A. Yes.</p> <p>24 Q. "I don't know. I thought I saw that with Beck</p> <p>25 this morning."</p>

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<p style="text-align: right;">Page 129</p> <p>1 Do you see that?</p> <p>2 A. Yes.</p> <p>3 Q. And then, he responds, "Yes, I just saw that.</p> <p>4 Beck is doubled too. Please call me. That is a</p> <p>5 deviation. All of our tracking could be screwed up."</p> <p>6 He also continues, "When you get something</p> <p>7 weird, call me."</p> <p>8 What would the deviation be a reference to?</p> <p>9 A. It sounds like, by this, that he thought all</p> <p>10 the sales doubled for some reason.</p> <p>11 Q. Got it.</p> <p>12 And do you and him, kind of, regularly track</p> <p>13 or monitor to see if there's any deviations or weird</p> <p>14 occurrences with the sales?</p> <p>15 A. That's what Mike and I do daily; we look for</p> <p>16 deviations.</p> <p>17 Q. Got it. Got it. Okay.</p> <p>18 And if you look through, sort of, the rest of</p> <p>19 this exhibit, which is Exhibit 410, it looks like almost</p> <p>20 every day you and Mr. Lindell are going back and forth</p> <p>21 with numbers associated with the radio, podcast and</p> <p>22 influencer sales with the use of promo codes; correct?</p> <p>23 A. Yes.</p> <p>24 Q. Okay. And in 2020, MyPillow was using a</p> <p>25 number of different radio, podcast, and media shows to</p>	<p style="text-align: right;">Page 131</p> <p>1 Larry Elder, who is Larry Elder?</p> <p>2 A. Another Salem Media.</p> <p>3 Q. David Harris, who is David Harris?</p> <p>4 A. He had a podcast.</p> <p>5 Q. Okay. RSBN, what is RSBN?</p> <p>6 A. Right Side Broadcasting Network.</p> <p>7 Q. Was that one of your radio, podcast,</p> <p>8 influencers?</p> <p>9 A. Yes.</p> <p>10 Q. Buck Sexton, was that one of them?</p> <p>11 A. Yes.</p> <p>12 Q. And what is Buck Sexton?</p> <p>13 A. He's on the same network as Sean Hannity and</p> <p>14 Glenn Beck.</p> <p>15 Q. Ben Shapiro, who is Ben Shapiro?</p> <p>16 A. He's with the Daily Wire.</p> <p>17 Q. During this, sort of, period of time in</p> <p>18 March of 2020 through, kind of, January 6th of 2021, do</p> <p>19 you recall who were the top performers or the top radio,</p> <p>20 podcast, influencers in terms of selling the most amount</p> <p>21 of MyPillow products?</p> <p>22 A. I would imagine the ones that I'm reporting to</p> <p>23 Mike Lindell in here.</p> <p>24 Q. Hannity, Beck, Gallagher?</p> <p>25 A. Yes.</p>
<p style="text-align: right;">Page 130</p> <p>1 help promote and sell MyPillow products; correct?</p> <p>2 A. Yes.</p> <p>3 Q. It's part of the MyPillow's marketing, to sell</p> <p>4 its pillows; correct?</p> <p>5 A. Yes.</p> <p>6 Q. And in 2020, MyPillow was marketing or</p> <p>7 promoting its products on Sean Hannity's show?</p> <p>8 A. Yes.</p> <p>9 Q. Glenn Beck's show?</p> <p>10 A. Yes.</p> <p>11 Q. Also, on Mike Gallagher's show?</p> <p>12 A. Yes.</p> <p>13 Q. Also, on Eric Metaxas's show?</p> <p>14 A. Yes.</p> <p>15 Q. The one in Boston?</p> <p>16 A. Yes.</p> <p>17 Q. Rick & Bubba?</p> <p>18 A. Yes.</p> <p>19 Q. Okay. Gorka, Dr. Sebastian Gorka?</p> <p>20 A. Yes.</p> <p>21 Q. I see one for W-O-R, WOR. I don't know what</p> <p>22 that is.</p> <p>23 What is that?</p> <p>24 A. It's a radio station in New York.</p> <p>25 Q. Got it. Got it.</p>	<p style="text-align: right;">Page 132</p> <p>1 Q. Gorka is one of them?</p> <p>2 A. Yes.</p> <p>3 Q. Metaxas is one of them?</p> <p>4 A. Yes.</p> <p>5 Q. Okay. You can put that aside. We're going to</p> <p>6 move on, Ms. Curtis. Thank you for your patience.</p> <p>7 Are you aware, in 2021, that Mike Lindell</p> <p>8 created and published a series of documentaries relating</p> <p>9 to voting machines and the outcome of the</p> <p>10 Presidential Election from 2020?</p> <p>11 A. Yes.</p> <p>12 Q. Are you aware that the first one of these</p> <p>13 documentaries or movies was called Absolute Proof?</p> <p>14 A. Yes.</p> <p>15 Q. Are you familiar with Absolute Proof?</p> <p>16 A. No.</p> <p>17 Q. Have you ever watched it before?</p> <p>18 A. Parts of it.</p> <p>19 Q. What is your understanding of the information</p> <p>20 being covered or relayed in Absolute Proof?</p> <p>21 A. I have no interest in it.</p> <p>22 Q. Did you have any role in creating any content</p> <p>23 that appeared in Absolute Proof?</p> <p>24 A. No.</p> <p>25 Q. Did you have any role in developing or</p>

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<p style="text-align: right;">Page 133</p> <p>1 producing Absolute Proof?</p> <p>2 A. No.</p> <p>3 Q. Did you have any role in coordinating any</p> <p>4 logistics for the creation of Absolute Proof?</p> <p>5 A. No.</p> <p>6 Q. You had watched parts of Absolute Proof</p> <p>7 before?</p> <p>8 A. The beginning. So I knew it was running.</p> <p>9 Q. Okay. I'm going to mark the next exhibit,</p> <p>10 which is going to be Exhibit 411 for the record. This is</p> <p>11 going to be different from the documents that we've looked</p> <p>12 at. It's actually going to be a video. I'm going to mark</p> <p>13 a video of the Absolute Proof documentary. It's about a</p> <p>14 two-hour video, and we will not watch the two hours. But</p> <p>15 I am going to have -- my associate's going to come around.</p> <p>16 You have a computer in front of you.</p> <p>17 A. Okay.</p> <p>18 Q. She's going to come around. This flash drive</p> <p>19 has a copy of the video. It's going to be put into the</p> <p>20 record as Exhibit 411.</p> <p>21 (Whereupon, Exhibit 411 was marked.)</p> <p>22 MS. WRIGLEY: Let's go off the record</p> <p>23 for a second.</p> <p>24 THE VIDEOGRAPHER: We're going off the</p> <p>25 record. The time now is 11:33 a.m.</p>	<p style="text-align: right;">Page 135</p> <p>1 today is what they don't want you to see, why they're</p> <p>2 trying to erase me.</p> <p>3 And what I've told everyone out there is, 'You</p> <p>4 know what? I've seen the evidence. I've been trying</p> <p>5 since November 4th to prove -- you know, to show what's</p> <p>6 out there, why these deviations that happened on election</p> <p>7 night.' And nothing -- none of it made any sense.</p> <p>8 So I go all in with everything I have --</p> <p>9 resources. Any time I heard something that maybe was</p> <p>10 relevant, I went and said -- you know, looked into it, did</p> <p>11 my own due diligence, had even my own investigation.</p> <p>12 Well, one day, I think it was like</p> <p>13 January 9th, all of a sudden, they brought me some uh -- a</p> <p>14 piece of evidence. It's 100 percent proof. It's like a</p> <p>15 print of inside the machine of the time stamp that showed</p> <p>16 another country -- other countries attacking us, hacking</p> <p>17 into our election through these machines, and it shows the</p> <p>18 votes flipped, and I'm going, 'Wow, I got to get this out</p> <p>19 there.' And from that point on, I started putting it out</p> <p>20 there, and that's when they just started attacking me.</p> <p>21 Well, they obviously are hiding something, and</p> <p>22 tonight you're going to see what they're hiding. You're</p> <p>23 going to see on this show, we have -- we're going to have</p> <p>24 cyber forensic experts. We're going to have --</p> <p>25 100 percent you're going to see all this evidence that by</p>
<p style="text-align: right;">Page 134</p> <p>1 (Discussion off the record.)</p> <p>2 THE VIDEOGRAPHER: We are going back on</p> <p>3 the record. The time now is 11:35 a.m.</p> <p>4 BY MS. WRIGLEY:</p> <p>5 Q. Ms. Curtis, just for the record, my associate</p> <p>6 has what's been marked as Exhibit 411 up on the computer</p> <p>7 in front of you. It's a video of the entire</p> <p>8 Absolute Proof documentary. She's going to, sort of, push</p> <p>9 "play," and we'll watch about two minutes of the video,</p> <p>10 and then I'm going to ask you some questions about it.</p> <p>11 A. Okay.</p> <p>12 MS. WRIGLEY: Julie, go ahead and play</p> <p>13 until about 2 minutes and 12 seconds.</p> <p>14 (Video Played:</p> <p>15 MIKE LINDELL: "Hello, everyone. This is</p> <p>16 Mike Lindell, the CEO of MyPillow. As you all know, I</p> <p>17 have been attacked the last month relentlessly on</p> <p>18 social media, by newspapers, by TV shows, by -- you name</p> <p>19 it, I've been attacked, and myself -- not just myself, but</p> <p>20 my company. The boycotts that are going on, sponsors are</p> <p>21 dropping me. Social media, they canceled my Twitter.</p> <p>22 Today they canceled MyPillow's Twitter account, my</p> <p>23 company's Twitter account.</p> <p>24 But before I was going to be erased completely,</p> <p>25 we put together this show. And what you're going to see</p>	<p style="text-align: right;">Page 136</p> <p>1 the time you're done seeing it, you're going to go, 'Wow.'</p> <p>2 100 percent it proves exactly what happened, that these</p> <p>3 machines were used to steal our election by other</p> <p>4 countries, including China." (Video stopped.)</p> <p>5 MS. WRIGLEY: Thanks.</p> <p>6 BY MS. WRIGLEY:</p> <p>7 Q. Ms. Curtis, have you seen that part of the</p> <p>8 Absolute Proof documentary before?</p> <p>9 A. Yes.</p> <p>10 Q. In that Absolute Proof documentary,</p> <p>11 Mr. Lindell is talking about vote-flipping for the 2020</p> <p>12 Presidential Election; correct?</p> <p>13 A. Yes.</p> <p>14 Q. Mr. Lindell is also talking about</p> <p>15 voting machines being used to steal the election?</p> <p>16 A. Yes.</p> <p>17 Q. Are you aware that in the course of the</p> <p>18 Absolute Proof documentary, that he identifies the</p> <p>19 Smartmatic plaintiffs in this case?</p> <p>20 A. Yes.</p> <p>21 Q. Okay. I'm going to show you another exhibit</p> <p>22 related to Absolute Proof.</p> <p>23 MS. WRIGLEY: This one's going to be</p> <p>24 marked Exhibit 412. Actually, strike this. I'm going to</p> <p>25 show you an exhibit that's been previously marked at a</p>

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<p style="text-align: right;">Page 137</p> <p>1 deposition, and it's Exhibit 47.</p> <p>2 (Whereupon, Exhibit 47 was introduced.)</p> <p>3 BY MS. WRIGLEY:</p> <p>4 Q. Ms. Curtis, the court reporter has handed to</p> <p>5 you what's been previously marked as Exhibit 47. It's got</p> <p>6 a Bates Number of DEF017561 to 562. Take a minute to look</p> <p>7 through this document, and then I'm going to ask you a few</p> <p>8 questions about it.</p> <p>9 Let me know when you're ready.</p> <p>10 A. Okay.</p> <p>11 Q. Looking at the document, do you see on the</p> <p>12 first page, it's an email from kg@mypillow.com to</p> <p>13 yourself?</p> <p>14 A. Yes.</p> <p>15 Q. And the date is March 31st, 2021?</p> <p>16 A. Yes.</p> <p>17 Q. The subject is, "Press Release."</p> <p>18 Do you see that?</p> <p>19 A. Yes.</p> <p>20 Q. This is an email from Katelyn Gamlin who works</p> <p>21 at MyPillow; correct?</p> <p>22 A. That's correct.</p> <p>23 Q. She states, "This can be sent after 10:45 a.m.</p> <p>24 CT to our affiliates (that's when we're posting it on</p> <p>25 social media.)"</p>	<p style="text-align: right;">Page 139</p> <p>1 Do you see that?</p> <p>2 A. Yes.</p> <p>3 Q. Okay. And you're aware that Absolute Proof</p> <p>4 documentary, a portion of which we just watched from</p> <p>5 Exhibit 411, was released by Mike Lindell on February 5th</p> <p>6 of 2001; correct?</p> <p>7 A. That's what it states here, yes.</p> <p>8 Q. Okay. At the bottom, it has a sentence, "All</p> <p>9 media inquiries can be emailed to</p> <p>10 mediainquiry@mypillow.com."</p> <p>11 Do you see that?</p> <p>12 A. Yes.</p> <p>13 Q. Okay. Did you have any responsibilities for</p> <p>14 handling any media inquiries in connection with</p> <p>15 Absolute Proof?</p> <p>16 A. No.</p> <p>17 Q. Okay. Do you know who at the company would</p> <p>18 have handled any media inquiries that came into that email</p> <p>19 address in connection with Absolute Proof or</p> <p>20 Scientific Proof?</p> <p>21 A. I don't know who that email goes to.</p> <p>22 Q. Okay. Would you have sent this press release</p> <p>23 to any media, podcaster, influencers as part of your job</p> <p>24 at MyPillow to any affiliates?</p> <p>25 A. Yes, I did send it out.</p>
<p style="text-align: right;">Page 138</p> <p>1 Do you see that?</p> <p>2 A. Yes.</p> <p>3 Q. Who is Katelyn Gamlin?</p> <p>4 A. Mike Lindell's assistant.</p> <p>5 Q. Okay. And then, attached to this email, do</p> <p>6 you see that there is a press release that has a heading,</p> <p>7 "Mike Lindell-TV Releases Irrefutable Election Theft Proof</p> <p>8 on New Television Special That Features World Renowned</p> <p>9 Physicist."</p> <p>10 Do you see that?</p> <p>11 A. Yes.</p> <p>12 Q. Okay. And then, actually, I want to kind of</p> <p>13 go down to the last paragraph of this press release, and</p> <p>14 it says -- which starts with, "Scientific Proof."</p> <p>15 Just let me know if you're there.</p> <p>16 A. I'm here.</p> <p>17 Q. That paragraph states, "Scientific Proof is</p> <p>18 the follow-up to the two-hour documovie Absolute Proof</p> <p>19 that was released on February 5th, 2021 and was seen by</p> <p>20 70 million people in the first four days of its release,</p> <p>21 and over 150 million to date across 42 countries. Like</p> <p>22 Absolute Proof, the executive producers of</p> <p>23 Scientific Proof are Mike Lindell, Brannon Howse, and</p> <p>24 Mary Fanning and was filmed by WBW Broadcast Network and</p> <p>25 directed by Brannon Howse."</p>	<p style="text-align: right;">Page 140</p> <p>1 Q. Okay. And did you send -- when Absolute Proof</p> <p>2 was released, did you send information about</p> <p>3 Absolute Proof to any of MyPillow's radio, podcast, or</p> <p>4 influencers?</p> <p>5 A. I was asked to send out the video, and I did.</p> <p>6 Q. Okay. Who asked you to send out the video?</p> <p>7 A. Mike Lindell.</p> <p>8 Q. Okay. And did you send that out as part of</p> <p>9 your job responsibilities at MyPillow?</p> <p>10 A. I sent it out per his request.</p> <p>11 Q. Did you, in connection with your job at</p> <p>12 MyPillow, take any steps to get Absolute Proof</p> <p>13 documentary, sort of, promoted through other media outlets</p> <p>14 or platforms?</p> <p>15 A. I just sent out an email and just said, "Mike</p> <p>16 wanted me to send this to you."</p> <p>17 Q. Okay. And was the goal for more people to</p> <p>18 view or watch Absolute Proof?</p> <p>19 MS. OLIVER: Objection to form.</p> <p>20 But you can answer.</p> <p>21 A. It wasn't my goal to do anything, just send</p> <p>22 out an email as per Mike's request.</p> <p>23 BY MS. WRIGLEY:</p> <p>24 Q. When Mike Lindell requested that you send it</p> <p>25 out to others, what was your understanding of the purpose</p>

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<p style="text-align: right;">Page 141</p> <p>1 of why you would be sending it to them?</p> <p>2 A. He just stated, "Can you please send this out</p> <p>3 to all the advertisers," and I did so.</p> <p>4 Q. And these are the advertisers of MyPillow?</p> <p>5 A. Yes.</p> <p>6 Q. Okay. How did you determine who to send</p> <p>7 Absolute Proof to?</p> <p>8 A. Whoever I had the email for, for all of my</p> <p>9 advertisers.</p> <p>10 Q. Okay. And did you keep, sort of, in your</p> <p>11 files, in connection with your job at MyPillow, sort of a</p> <p>12 list of all your radio, podcast, and influencers?</p> <p>13 A. I just have a group of emails for my</p> <p>14 advertisers.</p> <p>15 Q. Did you send Absolute Proof to all of them?</p> <p>16 A. I wouldn't -- no, I did not.</p> <p>17 Q. How did you determine which ones to send</p> <p>18 Absolute Proof to?</p> <p>19 A. The ones I had in the list at the time.</p> <p>20 Q. I'm sorry, what was -- what list are you</p> <p>21 referring to?</p> <p>22 A. My advertiser list.</p> <p>23 Q. Okay. So at the time, whoever was in your</p> <p>24 advertiser list for MyPillow --</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 143</p> <p>1 MyPillow?</p> <p>2 A. Yes.</p> <p>3 Q. Okay. And I'd go to the last page.</p> <p>4 Typically, the way these emails are produced, you have to</p> <p>5 go, sort of, from bottom to top.</p> <p>6 The first email in this chain is from</p> <p>7 Ms. Schoenberg to yourself on February 5th, 2021 at</p> <p>8 8:51 a.m.</p> <p>9 Do you see that?</p> <p>10 A. Yes.</p> <p>11 Q. The subject is, "Quick Question. Mike's</p> <p>12 Video. May I Announce on Air?"</p> <p>13 Do you see that?</p> <p>14 A. Yes.</p> <p>15 Q. Ms. Schoenberg states in the email, "Good</p> <p>16 morning, Dawn. I saw an interview with Mike last night.</p> <p>17 My husband had it, so I don't know who the interviewer</p> <p>18 was. May I announce Mike's 3-hour video today on my show</p> <p>19 (regarding the proof of election fraud/stolen). Did I</p> <p>20 understand the website correctly, mikelindell.com? Loved</p> <p>21 Mike's encouragement to so many. God is always in the</p> <p>22 business of miracles. I believe there have been many of</p> <p>23 us drawn closer to Him because of the horrific downturn of</p> <p>24 our nation and its morals. Christians must stand up. I</p> <p>25 believe God called me to pray on my show, not something a</p>
<p style="text-align: right;">Page 142</p> <p>1 Q. -- you sent the Absolute Proof out to?</p> <p>2 A. Yes.</p> <p>3 Q. Okay. I'm going to do another document.</p> <p>4 (Whereupon, Exhibit 412 was marked.)</p> <p>5 BY MS. WRIGLEY:</p> <p>6 Q. Ms. Curtis, the court reporter has handed you</p> <p>7 what's been marked as Exhibit 412. For the record, it's</p> <p>8 Bates Stamped DEF006566.</p> <p>9 Take a minute to review this document, and</p> <p>10 then I'll ask you a couple questions about it.</p> <p>11 Let me know when you're ready.</p> <p>12 A. I'm ready.</p> <p>13 Q. Okay. Looking at the document, do you see</p> <p>14 that it's an email chain from February 5th of 2001?</p> <p>15 A. Yes.</p> <p>16 Q. The email chain is between yourself and</p> <p>17 Beth Schoenberg; is that correct?</p> <p>18 A. Yes.</p> <p>19 Q. Ms. Schoenberg is with CSC Talk Radio; is that</p> <p>20 right?</p> <p>21 A. Yes.</p> <p>22 Q. What is CSC Talk Radio?</p> <p>23 A. Just one of my radio stations.</p> <p>24 Q. Got it.</p> <p>25 One of the radio stations that advertises for</p>	<p style="text-align: right;">Page 144</p> <p>1 nationally syndicated talk host does, but I do. I'm not</p> <p>2 bragging. I tried to talk God out of it. He won."</p> <p>3 Smiley face.</p> <p>4 Do you see that?</p> <p>5 A. Yes.</p> <p>6 Q. And then you responded to her email; correct?</p> <p>7 On the first page.</p> <p>8 A. Yes.</p> <p>9 Q. And in your response, you included a link.</p> <p>10 You stated, "Will send downloadable one and MJL once I</p> <p>11 have."</p> <p>12 Do you see that?</p> <p>13 A. Yes.</p> <p>14 Q. Was that a link to the Absolute Proof</p> <p>15 documentary?</p> <p>16 A. I can't say for sure. I don't know.</p> <p>17 Q. She responded to you; correct?</p> <p>18 A. Yes.</p> <p>19 Q. She stated, "I'm watching Mike's</p> <p>20 video/documentary now. I placed it on Facebook, and I</p> <p>21 plan to put it on my website, too. I have other internet</p> <p>22 affiliates who might do that, too."</p> <p>23 Did you see that?</p> <p>24 A. Yes.</p> <p>25 Q. And she sent that email to you on the same</p>

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<p style="text-align: right;">Page 145</p> <p>1 day, February 5th of 2021?</p> <p>2 A. Yep.</p> <p>3 Q. And that was the date that Mike Lindell</p> <p>4 released Absolute Proof; correct?</p> <p>5 A. Yes.</p> <p>6 Q. And do you recall any other documentary or</p> <p>7 video that he made around the time that you would have</p> <p>8 sent her other than the Absolute Proof documentary?</p> <p>9 A. No.</p> <p>10 Q. Okay. And you responded to Ms. Schoenberg</p> <p>11 from your MyPillow email address?</p> <p>12 A. Yes.</p> <p>13 Q. And your response actually has your signature</p> <p>14 line in it that's got marketing director, MyPillow, and</p> <p>15 then the headquarters address for MyPillow at the time;</p> <p>16 correct?</p> <p>17 A. Correct.</p> <p>18 Q. Okay. And at this time during the day, which</p> <p>19 I think you were emailing her at, sort of, 8:00 and 9:00</p> <p>20 in the morning, would you have been, sort of, at work at</p> <p>21 MyPillow?</p> <p>22 A. Yes.</p> <p>23 Q. Okay. And at the time you received this email</p> <p>24 from Ms. Schoenberg, were you aware she was planning to</p> <p>25 post the video that you sent her to her Facebook and the</p>	<p style="text-align: right;">Page 147</p> <p>1 Q. For the record, the document has a</p> <p>2 Bates Number 022482 and it's one page.</p> <p>3 Do you see this is an email chain from</p> <p>4 February 1st, 2001?</p> <p>5 A. Yes.</p> <p>6 Q. And in looking at the bottom of this chain, do</p> <p>7 you see the first one is from kg@mypillow.com. It's to</p> <p>8 saracronin@mypillow.com, dawncurtis@mypillow.com, and</p> <p>9 shannonsmith@mypillow.com.</p> <p>10 Do you see that?</p> <p>11 A. Yes.</p> <p>12 Q. And K.G., is that Katelyn Gamlin?</p> <p>13 A. Yes.</p> <p>14 Q. And at this time she worked at MyPillow?</p> <p>15 A. Yes.</p> <p>16 Q. You were a recipient of this email?</p> <p>17 A. Yes.</p> <p>18 Q. The subject matter is, "Vimeo Absolute Proof</p> <p>19 Two-Hour Documentary."</p> <p>20 Do you see that?</p> <p>21 A. Yes.</p> <p>22 Q. And she sends a link to Vimeo. She also</p> <p>23 states, "Will send downloadable one and MJL once I have."</p> <p>24 Do you see that?</p> <p>25 A. Yes.</p>
<p style="text-align: right;">Page 146</p> <p>1 website?</p> <p>2 A. I wasn't aware that she sent the email.</p> <p>3 Q. Okay. As you sit here today, do you know</p> <p>4 whether she has posted Absolute Proof documentary to her</p> <p>5 Facebook or the website?</p> <p>6 A. I do not know.</p> <p>7 MS. WRIGLEY: Okay. Let's go off the</p> <p>8 record and take a break.</p> <p>9 THE VIDEOGRAPHER: We are going off the</p> <p>10 record. The time now is 11:50 a.m. This concludes Media</p> <p>11 Unit Number 2.</p> <p>12 (Whereupon, a recess was taken from</p> <p>13 11:50 a.m. to 12:34 a.m.)</p> <p>14 THE VIDEOGRAPHER: We are going back on</p> <p>15 the record. The time now is 12:24 p.m. This is the</p> <p>16 beginning of Media Unit Number 3.</p> <p>17 BY MS. WRIGLEY:</p> <p>18 Q. Good afternoon, Ms. Curtis. I'm going to hand</p> <p>19 to you what's been marked as Exhibit 413.</p> <p>20 (Whereupon, Exhibit 413 was marked.)</p> <p>21 BY MS. WRIGLEY:</p> <p>22 Q. Take a look at that document and let me know</p> <p>23 when you're ready, and I'll ask you a few questions about</p> <p>24 it.</p> <p>25 A. I'm ready.</p>	<p style="text-align: right;">Page 148</p> <p>1 Q. Now, do you see that the next email in this</p> <p>2 chain is from yourself on the same day, February 5th, 2001</p> <p>3 to Jerry Schesso?</p> <p>4 A. Yes.</p> <p>5 Q. And is that how you pronounce it?</p> <p>6 A. Yes.</p> <p>7 Q. Okay. And you forward the Vimeo</p> <p>8 Absolute Proof two-hour documentary link to Mr. Schesso;</p> <p>9 correct?</p> <p>10 A. Yes.</p> <p>11 Q. And is that the -- that's the -- strike that.</p> <p>12 You state, "Good morning, happy birthday." Smiley face.</p> <p>13 "The link below is Mike's documentary about election</p> <p>14 fraud."</p> <p>15 Do you see that?</p> <p>16 A. Yes.</p> <p>17 Q. At this time, why would you have sent the</p> <p>18 Absolute Proof documentary to Mr. Schesso?</p> <p>19 A. He is also a friend of Mike's and works at</p> <p>20 MyPillow and wanted to see it.</p> <p>21 Q. Okay. And then, do you see at the top, he</p> <p>22 then forwards the email to rgrape91@gmail.com.</p> <p>23 Do you see that?</p> <p>24 A. Yes.</p> <p>25 Q. Do you know who rgrape91@gmail.com is?</p>

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<p style="text-align: right;">Page 149</p> <p>1 A. I do not.</p> <p>2 Q. Okay. We can move on.</p> <p>3 I'm going to hand to you what's been marked as</p> <p>4 Exhibit 414.</p> <p>5 (Whereupon, Exhibit 414 was marked.)</p> <p>6 BY MS. WRIGLEY:</p> <p>7 Q. Take a look at that document and let me know</p> <p>8 when you're ready.</p> <p>9 A. Okay.</p> <p>10 Q. For the record, it's Bates Stamped DEF016737,</p> <p>11 and it's two pages.</p> <p>12 Do you see this is an email chain from</p> <p>13 February 5th, 2021?</p> <p>14 A. Yes.</p> <p>15 Q. And you're included on this email chain;</p> <p>16 correct?</p> <p>17 A. Yes, I am.</p> <p>18 Q. And then, the email at the bottom, the first</p> <p>19 one in this chain is from you at 11:11 a.m.</p> <p>20 Do you see that?</p> <p>21 A. I do.</p> <p>22 Q. And you state, "TV news stations give this</p> <p>23 downloadable link." And then, you have a link to a</p> <p>24 Dropbox. And then, if you look at the end of that</p> <p>25 link, it says AbsoluteProof.MP4 and some other</p>	<p style="text-align: right;">Page 151</p> <p>1 A lot of K's.</p> <p>2 Q. And was this one of MyPillow's radio podcaster</p> <p>3 influencers at the time in February 2021?</p> <p>4 A. I don't believe she was. There was another</p> <p>5 gal that was working with me at that time, Julia Schertz,</p> <p>6 who no longer worked with the company, and I believe it</p> <p>7 was one of her stations.</p> <p>8 Q. Okay.</p> <p>9 A. I did not work with Kim Komando.</p> <p>10 Q. And then you responded to the email from Kip</p> <p>11 on that same day.</p> <p>12 Do you see that?</p> <p>13 A. Yes.</p> <p>14 Q. And in Kip's email he says, "I love this.</p> <p>15 Thank you."</p> <p>16 And your response was, "Of course."</p> <p>17 Do you see this?</p> <p>18 A. Yes.</p> <p>19 Q. At the time, why would you have been sending</p> <p>20 Kip Kuroski the Absolute Proof documentary?</p> <p>21 A. I'm guessing because he was in my email chain.</p> <p>22 Q. Okay. We're going to go to the next document.</p> <p>23 You can put that aside. I'm going to hand to you what's</p> <p>24 been marked as Exhibit 415.</p> <p>25 (Whereupon, Exhibit 415 was marked.)</p>
<p style="text-align: right;">Page 150</p> <p>1 characters.</p> <p>2 Do you see that?</p> <p>3 A. Yes.</p> <p>4 Q. And then, below there, you state, "Random</p> <p>5 people are customers," and then, you have a link to a</p> <p>6 michaeljlindell.com.</p> <p>7 Do you see that?</p> <p>8 A. Yes.</p> <p>9 Q. And in this email, were you providing a link</p> <p>10 to the Absolute Proof documentary and then, sort of, a</p> <p>11 link or direction to mikejlindell.com for "Random people</p> <p>12 are customers" to access Absolute Proof?</p> <p>13 A. I'd assume so by the looks of this email.</p> <p>14 Q. Okay. And then, if you look at the email in</p> <p>15 response, it's from Kip Kuroski.</p> <p>16 Do you see that?</p> <p>17 A. Yes.</p> <p>18 Q. Kip@komando.com?</p> <p>19 A. Yes.</p> <p>20 Q. Who is Kipkuroski@komando.com?</p> <p>21 A. Kim Komando's rep.</p> <p>22 Q. Kim Komando's rep?</p> <p>23 A. Yes.</p> <p>24 Q. Whose name is Kip?</p> <p>25 A. His name is Kip, yes. That's confusing, yes.</p>	<p style="text-align: right;">Page 152</p> <p>1 BY MS. WRIGLEY:</p> <p>2 Q. It's another email. For the record, it's</p> <p>3 Bates Stamped DEF019495. Just let me know when you're</p> <p>4 ready.</p> <p>5 A. I'm ready.</p> <p>6 Q. Do you see that this is another email chain</p> <p>7 from February 5th, 2021?</p> <p>8 A. Yes.</p> <p>9 Q. The first email in this chain is from you at</p> <p>10 1:09 p.m. to Nick Brino at forevermediainc.com.</p> <p>11 Do you see that?</p> <p>12 A. Yes.</p> <p>13 Q. The subject of your email is, "Mike's</p> <p>14 Documentary on Election Fraud."</p> <p>15 Do you see that?</p> <p>16 A. Yes.</p> <p>17 Q. In your email, you state, "TV/news stations</p> <p>18 give this downloadable link." You have a link to a</p> <p>19 dropbox.com with some additional information in the link</p> <p>20 that, at the end, refers to Absolute Proof.</p> <p>21 Do you see that?</p> <p>22 A. Yes.</p> <p>23 Q. You also say, "Random people are customers,"</p> <p>24 and then you have a link to michaeljlindell.com.</p> <p>25 Do you see that?</p>

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<p style="text-align: right;">Page 153</p> <p>1 A. Yes.</p> <p>2 Q. And then Mr. Brino responded the same day;</p> <p>3 correct?</p> <p>4 A. Yes.</p> <p>5 Q. And he stated, "Absolutely incredible. Thank</p> <p>6 you for sending this. I so appreciate all Mike is doing</p> <p>7 and I support him completely."</p> <p>8 Do you see that?</p> <p>9 A. Yes.</p> <p>10 Q. Then, on February 5th, 2021, did you send</p> <p>11 Mr. Brino a link to the Absolute Proof documentary?</p> <p>12 A. Yes, copy-and-pasted that to several,</p> <p>13 obviously. That's what it looks like.</p> <p>14 Q. Now, in your email, you had indicated "TV news</p> <p>15 stations give this downloadable link."</p> <p>16 What, sort of, is that a reference to in</p> <p>17 connection with the TV and news stations?</p> <p>18 A. I have no idea.</p> <p>19 Q. Okay. What about, sort of, random people are</p> <p>20 customers?</p> <p>21 A. I don't know what that is, either.</p> <p>22 Q. Okay. At the time, would you have been</p> <p>23 sending these links to Absolute Proof to Mr. Brino as part</p> <p>24 of your job at MyPillow in marketing?</p> <p>25 A. Like I stated before, as per Mike's request to</p>	<p style="text-align: right;">Page 155</p> <p>1 BY MS. WRIGLEY:</p> <p>2 Q. For the record, it's Bates Stamped DEF068429.</p> <p>3 Take a look at this, and then I'll ask you some questions.</p> <p>4 A. Okay.</p> <p>5 Q. Do you see this is an email chain from</p> <p>6 February 5th, 2021?</p> <p>7 A. Yes.</p> <p>8 Q. This is an email chain between yourself and</p> <p>9 Liz Willis at RSN TV?</p> <p>10 A. Yes.</p> <p>11 Q. And the first email in the chain is from you</p> <p>12 at 12:13 p.m.; correct?</p> <p>13 A. Yes.</p> <p>14 Q. And you send a similar email, like the one</p> <p>15 that we've just seen, that states, "TV/news stations give</p> <p>16 this downloadable link," and it's got a Dropbox link to</p> <p>17 Absolute Proof; correct?</p> <p>18 A. Yes.</p> <p>19 Q. And you said, "Random people are customers,"</p> <p>20 and then sort of the -- strike that.</p> <p>21 "Random people are customers," and then the</p> <p>22 mikejlindell.com link; correct?</p> <p>23 A. Correct.</p> <p>24 Q. And Ms. Willis responded to your email</p> <p>25 stating, "Thanks, Dawn. We're with Todd and Graham about</p>
<p style="text-align: right;">Page 154</p> <p>1 the people that I have emails for.</p> <p>2 Q. Got it. Got it.</p> <p>3 And it came from your MyPillow email address;</p> <p>4 right?</p> <p>5 A. That is correct.</p> <p>6 Q. And it's got your signature handle of</p> <p>7 marketing director for MyPillow on here as well; correct?</p> <p>8 A. Yes.</p> <p>9 Q. Okay. And then, who's Nick Brino at</p> <p>10 forevermediainc.com?</p> <p>11 A. He was a rep for Forever Media.</p> <p>12 Q. Okay. And was Forever Media a radio,</p> <p>13 podcaster, or influencer doing promos for MyPillow at the</p> <p>14 time?</p> <p>15 A. Yes.</p> <p>16 Q. And that was, sort of, in your list of people</p> <p>17 doing promos or advertisements at the time for MyPillow?</p> <p>18 A. He was in my email list, yes.</p> <p>19 Q. Okay. And do you know whether Mr. Brino made</p> <p>20 this available or sent it to other people?</p> <p>21 A. I don't know what anyone did with it after I</p> <p>22 sent it to them.</p> <p>23 Q. Okay. I'm going to hand you another document.</p> <p>24 This one's marked Exhibit 416.</p> <p>25 (Whereupon, Exhibit 416 was marked.)</p>	<p style="text-align: right;">Page 156</p> <p>1 to film. So excited to be here. I'm like a kid in a</p> <p>2 candy store."</p> <p>3 Do you see that?</p> <p>4 A. Yes.</p> <p>5 Q. And who is Liz Willis?</p> <p>6 A. She was a TV talent for Right Side</p> <p>7 Broadcasting Network.</p> <p>8 THE REPORTER: For what?</p> <p>9 A. Right Side Broadcasting Network.</p> <p>10 BY MS. WRIGLEY:</p> <p>11 Q. Was Right Side Broadcasting Network on your</p> <p>12 list of MyPillow radio, podcast, and influences?</p> <p>13 A. Yes.</p> <p>14 Q. At the time they did marketing for MyPillow?</p> <p>15 A. Yes.</p> <p>16 Q. And then she referenced Todd and Graham.</p> <p>17 Do you know who that is?</p> <p>18 A. Yes, Todd is our manager down at the shop, and</p> <p>19 Graham was his assistant.</p> <p>20 Q. What's Todd's last name?</p> <p>21 A. Todd Taylor.</p> <p>22 Q. What is Graham's last name?</p> <p>23 A. I don't know.</p> <p>24 Q. Okay. And when you say "shop," is there a</p> <p>25 place?</p>

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<p style="text-align: right;">Page 157</p> <p>1 A. Our warehouse.</p> <p>2 Q. Your warehouse, okay.</p> <p>3 So Liz was down at the MyPillow warehouse</p> <p>4 about to film?</p> <p>5 A. That is correct.</p> <p>6 Q. Got it.</p> <p>7 And then you responded to her email on that</p> <p>8 date; correct?</p> <p>9 A. That's correct.</p> <p>10 Q. Okay. And do you know if Liz Willis or RSBN</p> <p>11 TV further published the Absolute Proof documentary?</p> <p>12 A. I do not know that.</p> <p>13 Q. And why did you send the Absolute Proof</p> <p>14 documentary to Ms. Willis at this time?</p> <p>15 A. Like I stated before, it was per Mike's</p> <p>16 request.</p> <p>17 Q. Got it. Okay.</p> <p>18 I'm going to hand to you what's been marked as</p> <p>19 Exhibit 417?</p> <p>20 (Whereupon, Exhibit 417 was marked.)</p> <p>21 A. Okay.</p> <p>22 BY MS. WRIGLEY:</p> <p>23 Q. For the record, it's Bates Stamped DEF025299.</p> <p>24 Do you see this is an email chain between you</p> <p>25 and Shiloh Gmail on February 5th, 2021?</p>	<p style="text-align: right;">Page 159</p> <p>1 (Whereupon, Exhibit 418 was marked.)</p> <p>2 BY MS. WRIGLEY:</p> <p>3 Q. For the record, it's Bates marked DEF018146,</p> <p>4 it's two pages.</p> <p>5 Do you see this as an email chain that</p> <p>6 includes kathleenbensi@saalemreps.com, Dr. Sebastian Gorka,</p> <p>7 and yourself?</p> <p>8 A. Yes.</p> <p>9 Q. The email chain is from February 5th, 2021;</p> <p>10 correct?</p> <p>11 A. Yes.</p> <p>12 Q. The first email in the chain at the bottom is</p> <p>13 from Kathleen Bensi where she writes, "H Seb, Mike Lindell</p> <p>14 has released a documentary today about voting fraud. He</p> <p>15 would like for you to watch it. Here's the downloadable."</p> <p>16 And it has a Dropbox link to Absolute Proof and another</p> <p>17 link; michaeljlindell.com.</p> <p>18 Do you see that?</p> <p>19 A. Yes.</p> <p>20 Q. Who is Kathleen Bensi?</p> <p>21 A. She's my rep for Salem Media.</p> <p>22 Q. And what's at Salem Media?</p> <p>23 A. My radio stations that I work with.</p> <p>24 Q. And at the time in February of 2021, would you</p> <p>25 have been working with Salem reps and Kathleen Bensi in</p>
<p style="text-align: right;">Page 158</p> <p>1 A. Yes.</p> <p>2 Q. The subject of the email is, "Mike's</p> <p>3 Documentary on Election Fraud"; correct?</p> <p>4 A. Yes.</p> <p>5 Q. And on the first email on this chain you write</p> <p>6 to Shiloh Gmail at 1:14 p.m., correct?</p> <p>7 A. Yes.</p> <p>8 Q. You write, "TV news stations give this</p> <p>9 downloadable link." You have a link to the Absolute Proof</p> <p>10 from Dropbox.</p> <p>11 You also write, "Random people are customers,"</p> <p>12 with a link to michaeljlindell.com.</p> <p>13 Do you see that?</p> <p>14 A. Yes.</p> <p>15 Q. And Shiloh Gmail responded; correct?</p> <p>16 A. Yes.</p> <p>17 Q. Who is Shiloh Gmail?</p> <p>18 A. I have no idea.</p> <p>19 Q. Okay. And do you understand why at the time</p> <p>20 you would have been sending the Absolute Proof to Shiloh</p> <p>21 Gmail?</p> <p>22 A. Shiloh obviously was in my email address.</p> <p>23 Q. Okay. You can put that one aside.</p> <p>24 I'm going to hand to you what's been marked as</p> <p>25 Exhibit 418.</p>	<p style="text-align: right;">Page 160</p> <p>1 connection with MyPillow marketing?</p> <p>2 A. Yes.</p> <p>3 Q. Dr. Sebastian Gorka responds to Ms. Bensi that</p> <p>4 day stating, "Please tell Mike I've plugged the film three</p> <p>5 times on the show today already. Dr. G."</p> <p>6 Do you see that?</p> <p>7 A. Yes.</p> <p>8 Q. Ms. Bensi then forwards on that same day his</p> <p>9 email stating, "Dawn, see below..."</p> <p>10 Do you see that?</p> <p>11 A. Yes.</p> <p>12 Q. And then you respond to Ms. Bensi that same</p> <p>13 day stating, "I just text him about Gorka." Smiley face.</p> <p>14 Do you see that?</p> <p>15 A. Yes.</p> <p>16 Q. And was that "text him" a reference to</p> <p>17 Mike Lindell?</p> <p>18 A. By the looks of this, yes, that's what it</p> <p>19 looks like.</p> <p>20 Q. Okay. And then at the time, was</p> <p>21 Dr. Sebastian Gorka a radio, podcast, influencer for</p> <p>22 doing, sort of, MyPillow parking -- marketing?</p> <p>23 A. Yes.</p> <p>24 Q. Let me clean that question up.</p> <p>25 At the time, was Dr. Sebastian Gorka a radio,</p>

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<p style="text-align: right;">Page 161</p> <p>1 podcast, or influencer that did MyPillow marketing?</p> <p>2 A. Yes.</p> <p>3 Q. And in the email, it indicates that he had</p> <p>4 plugged the Absolute Proof on February 5th, 2021; correct?</p> <p>5 A. That's what it looks like here.</p> <p>6 Q. And were you aware, in February of 2021,</p> <p>7 whether any of the radio, podcast, and influencers were</p> <p>8 plugging or promoting Absolute Proof?</p> <p>9 A. I just sent it out. I don't know who posted</p> <p>10 it, plugged it, anything.</p> <p>11 Q. Okay.</p> <p>12 A. Unless they state it in the email that they</p> <p>13 did.</p> <p>14 Q. Okay. I'm going to hand to you what's been</p> <p>15 marked as Exhibit 419.</p> <p>16 (Whereupon, Exhibit 419 was marked.)</p> <p>17 BY MS. WRIGLEY:</p> <p>18 Q. For the record, it's Bates Stamped DEF022390.</p> <p>19 Do you see this is an email from you to</p> <p>20 calebsvendsen@wwib.com, subject line, "Mike's Documentary</p> <p>21 on Election Fraud." The date is February 5th, 2021. The</p> <p>22 time is -- I'm sorry, I'm trying to calculate it.</p> <p>23 MS. OLIVER: 6.</p> <p>24 BY MS. WRIGLEY:</p> <p>25 Q. 6:09 p.m.?</p>	<p style="text-align: right;">Page 163</p> <p>1 looked at from Exhibit 419; correct?</p> <p>2 A. Correct.</p> <p>3 Q. You indicate or provide a Dropbox link to</p> <p>4 Absolute Proof with a note TV stations -- TV news station</p> <p>5 give this downloadable link along with a</p> <p>6 michaeljlindell.com link for, "Random people are</p> <p>7 customers"; correct?</p> <p>8 A. Correct.</p> <p>9 Q. Who's Woody Zimmerman?</p> <p>10 A. My rep for a radio station, and he worked in</p> <p>11 Indiana.</p> <p>12 Q. At the time was that radio station a radio,</p> <p>13 podcast, influencer that did MyPillow marketing?</p> <p>14 A. Yes.</p> <p>15 Q. I'm going to hand to you Exhibit 421. For the</p> <p>16 record this is DEF018055.</p> <p>17 (Whereupon, Exhibit 421 was marked.)</p> <p>18 BY MS. WRIGLEY:</p> <p>19 Q. Do you see this is an email on February 5th,</p> <p>20 2021, 6:10 p.m. from you to Annie Marie --</p> <p>21 anniemariadelgado@icloud.com, subject line, "Mike's</p> <p>22 Documentary on Election Fraud."</p> <p>23 Do you see this?</p> <p>24 A. Yes.</p> <p>25 Q. This is email similar to the previous ones</p>
<p style="text-align: right;">Page 162</p> <p>1 A. Yes.</p> <p>2 Q. You sent Caleb Svendsen -- Svendsen a similar</p> <p>3 email to the ones we've seen, "TV news stations give this</p> <p>4 downloadable link" with a link to the Absolute Proof, and</p> <p>5 then also the note about, "Random people are customers"</p> <p>6 and a link to michaeljlindell.com.</p> <p>7 Do you see that?</p> <p>8 A. Yes.</p> <p>9 Q. Who is Caleb Svendsen?</p> <p>10 A. My rep for WWIB radio station in Eau Claire,</p> <p>11 Wisconsin.</p> <p>12 Q. At this time, was that a radio station, a</p> <p>13 radio, podcast, influencer that did marketing for</p> <p>14 MyPillow?</p> <p>15 A. Yes.</p> <p>16 Q. I'm going to hand to you what's been marked as</p> <p>17 Exhibit 420.</p> <p>18 (Whereupon, Exhibit 420 was marked.)</p> <p>19 BY MS. WRIGLEY:</p> <p>20 Q. For the record, it's DEF016635.</p> <p>21 Do you see this is an email from you to Woody</p> <p>22 Zimmerman, subject, "Mike's Documentary on Election Fraud"</p> <p>23 from February 5th, 2021 at 6:09 p.m.?</p> <p>24 A. Yes.</p> <p>25 Q. This email looks similar to the one we just</p>	<p style="text-align: right;">Page 164</p> <p>1 that we've looked at; correct?</p> <p>2 A. Yes.</p> <p>3 Q. And it has a downloadable link to</p> <p>4 Absolute Proof for TV news stations; correct?</p> <p>5 A. Yes.</p> <p>6 Q. And it has a link to michaeljlindell.com for,</p> <p>7 "Random people are customers"; right?</p> <p>8 A. Yes.</p> <p>9 Q. Who is Annie Marie Delgado?</p> <p>10 A. She had a podcast I was working with at the</p> <p>11 time.</p> <p>12 Q. Okay. And were you working with her in</p> <p>13 connection with doing MyPillow marketing?</p> <p>14 A. Yes.</p> <p>15 Q. I'm going to hand to you Exhibit 422. For the</p> <p>16 record, it's Bates Stamped DEF016634.</p> <p>17 (Whereupon, Exhibit 422 was marked.)</p> <p>18 BY MS. WRIGLEY:</p> <p>19 Q. Do you see this is an email from you to</p> <p>20 mikepooler@familybroadcastingcorporation.com on</p> <p>21 February 5th, 2021 at 6:11 p.m., subject, "Mike's</p> <p>22 Documentary on Election Fraud."</p> <p>23 Do you see that?</p> <p>24 A. Yes.</p> <p>25 Q. And this email is similar to the ones we</p>

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<p style="text-align: right;">Page 165</p> <p>1 previously saw where you provide a downloadable link to</p> <p>2 Absolute Proof for TV/news stations and then a link to</p> <p>3 michaeljlindell.com; correct?</p> <p>4 A. Yes.</p> <p>5 Q. Who is Mike Pooler?</p> <p>6 A. Another rep for Family Broadcasting in</p> <p>7 Indiana.</p> <p>8 Q. And was Family Broadcasting doing marketing</p> <p>9 for MyPillow at the time?</p> <p>10 A. Yes.</p> <p>11 Q. I'm going to hand you Exhibit 423. For the</p> <p>12 record it's DEF025203.</p> <p>13 (Whereupon, Exhibit 423 was marked.)</p> <p>14 BY MS. WRIGLEY:</p> <p>15 Q. Do you see this is an email from you to</p> <p>16 markanthony@patriotandpreachershow.com, subject line,</p> <p>17 "Mike's documentary on election fraud," dated</p> <p>18 February 5th, 2021 at 6:12 p.m.?</p> <p>19 A. Yes.</p> <p>20 Q. This email looks similar to the emails that</p> <p>21 we've just seen in the prior exhibits; correct?</p> <p>22 A. Yes.</p> <p>23 Q. They sent a downloadable link of</p> <p>24 Absolute Proof for TV/news stations; correct?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 167</p> <p>1 Absolute Proof for TV/news stations and then the link for</p> <p>2 michaeljlindell.com; correct?</p> <p>3 A. Yes.</p> <p>4 Q. Who is Steel Toe Morning Show?</p> <p>5 A. Aaron is my rep, and that was his show, Steel</p> <p>6 Toe Morning Show.</p> <p>7 Q. Was the show doing marketing for MyPillow at</p> <p>8 the time?</p> <p>9 A. Yes.</p> <p>10 Q. Thank you.</p> <p>11 I'm going to hand to you what's been</p> <p>12 previously marked as Deposition Exhibit 100 in this case.</p> <p>13 For the record the Bates Stamp is DEF015183.</p> <p>14 (Whereupon, Exhibit 100 was introduced.)</p> <p>15 BY MS. WRIGLEY:</p> <p>16 Q. Do you see this is another email from you on</p> <p>17 February 5th, 2021?</p> <p>18 A. Yes.</p> <p>19 Q. This one's at 6:13 p.m.; correct?</p> <p>20 A. Yes.</p> <p>21 Q. You sent this to lizwillis@rsbn.tv; correct?</p> <p>22 A. Yes.</p> <p>23 Q. The subject is, "Mike's Documentary on</p> <p>24 Election Fraud"; correct?</p> <p>25 A. Yes.</p>
<p style="text-align: right;">Page 166</p> <p>1 Q. Along with a link for michaeljlindell.com;</p> <p>2 right?</p> <p>3 A. Yes.</p> <p>4 Q. Who is Mark Anthony at Preacher --</p> <p>5 patriotandpreachershow.com?</p> <p>6 A. I work with him with his podcast.</p> <p>7 Q. And was his podcast doing MyPillow marketing</p> <p>8 at the time?</p> <p>9 A. Yes.</p> <p>10 Q. I'm going to hand you Exhibit 424. For the</p> <p>11 record, it's Bates DEF020883.</p> <p>12 (Whereupon, Exhibit 424 was marked.)</p> <p>13 BY MS. WRIGLEY:</p> <p>14 Q. Do you see this is an email from yourself to</p> <p>15 Steel Toe Morning Show, the email address is</p> <p>16 aaronimholte@gmail.com?</p> <p>17 A. Yes.</p> <p>18 Q. The subject is, "Mike's Documentary on</p> <p>19 Election Fraud"; correct?</p> <p>20 A. Yes.</p> <p>21 Q. The date is February 5th, 2021 at 6:12 p.m.;</p> <p>22 correct?</p> <p>23 A. Yes.</p> <p>24 Q. You sent this email to him with the similar</p> <p>25 information as the previous ones, a downloadable link for</p>	<p style="text-align: right;">Page 168</p> <p>1 Q. You sent information similar to the exhibits</p> <p>2 that we previously saw with a downloadable link to</p> <p>3 Absolute Proof for TV/news stations and then a link for</p> <p>4 michaeljlindell.com; correct?</p> <p>5 A. Yes.</p> <p>6 Q. Remind me who Liz Willis at RSBN.TV is?</p> <p>7 A. She was my rep also, a spokesperson for RSBN.</p> <p>8 Q. And was doing marketing for MyPillow at the</p> <p>9 time; correct?</p> <p>10 A. Yes.</p> <p>11 Q. I'm going to hand to you Exhibit 425. For the</p> <p>12 record, it's Bates Stamped DEF025202.</p> <p>13 (Whereupon, Exhibit 425 was marked.)</p> <p>14 BY MS. WRIGLEY:</p> <p>15 Q. Do you see this is an email you sent to</p> <p>16 Sara Carter copying Jennie Taer -- or Tear -- subject</p> <p>17 line, "Mike's Documentary on Election Fraud," on</p> <p>18 February 5th, 2021 at 6:13 p.m.?</p> <p>19 A. Yes.</p> <p>20 Q. This email looks similar to the ones that</p> <p>21 we've seen in the previous exhibits; correct?</p> <p>22 A. Yes.</p> <p>23 Q. You sent a link to the Absolute Proof for</p> <p>24 TV/news stations and then a link for michaeljlindell.com;</p> <p>25 correct?</p>

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<p style="text-align: right;">Page 169</p> <p>1 A. Yes.</p> <p>2 Q. And who is Sara Carter and Jennie Taer?</p> <p>3 A. Sara was the talent, and Jeannie was her rep.</p> <p>4 Q. And where was Sara a talent at?</p> <p>5 A. She had a podcast.</p> <p>6 Q. Okay. So this was one of the podcasters?</p> <p>7 A. Yes.</p> <p>8 Q. And was she a podcaster doing marketing for</p> <p>9 MyPillow at the time?</p> <p>10 A. Yes.</p> <p>11 Q. I'm going to hand to you Exhibit 426. For the</p> <p>12 record it's Bates Number DEF019345.</p> <p>13 (Whereupon, Exhibit 426 was marked.)</p> <p>14 BY MS. WRIGLEY:</p> <p>15 Q. Do you see this is an email from you to</p> <p>16 Patrick Coffin, subject, "Mike's Documentary on Election</p> <p>17 Fraud," on February 5th, 2021 at 6:14 p.m.?</p> <p>18 A. Yes.</p> <p>19 Q. And this email looks similar to the previous</p> <p>20 ones where you send a downloadable link for Absolute Proof</p> <p>21 for TV/news stations and then a link for, "Random people</p> <p>22 are customers" to mikejlindell.com [sic]; correct?</p> <p>23 A. Yes.</p> <p>24 Q. Who is Patrick Coffin.</p> <p>25 A. He has his own podcast.</p>	<p style="text-align: right;">Page 171</p> <p>1 A. My rep for Life Changing radio.</p> <p>2 Q. And was that radio doing MyPillow marketing at</p> <p>3 the time?</p> <p>4 A. Yes.</p> <p>5 Q. And I'm going to hand you Exhibit 428. For</p> <p>6 the record, it's Bates Stamped DEF016633.</p> <p>7 (Whereupon, Exhibit 428 was marked.)</p> <p>8 BY MS. WRIGLEY:</p> <p>9 Q. Do you see this is an email that you sent on</p> <p>10 February 5th, 2021 at 6:14 p.m.?</p> <p>11 A. Yes.</p> <p>12 Q. You sent it to Puredi and Ruth Hillary, email</p> <p>13 address is shilohhtc@gmail.com with subject line, "Mike's</p> <p>14 Documentary on Election Fraud."</p> <p>15 Do you see that?</p> <p>16 A. Yes.</p> <p>17 Q. And this email looks similar to the ones we</p> <p>18 saw in the prior exhibits where you sent a link to</p> <p>19 Absolute Proof for TV/news stations and the link for</p> <p>20 michaeljlindell.com to "Random people are customers";</p> <p>21 correct?</p> <p>22 A. Yes.</p> <p>23 Q. Who is Puredi and Ruth Hillary?</p> <p>24 A. They had a podcast, and now the Shiloh looks</p> <p>25 familiar from before. So that was their show at the time.</p>
<p style="text-align: right;">Page 170</p> <p>1 Q. Was this a MyPillow podcaster doing marketing</p> <p>2 for MyPillow at the time?</p> <p>3 A. Yes.</p> <p>4 Q. And would you have sent him this link in</p> <p>5 connection with your job at MyPillow?</p> <p>6 A. As per Mike's request.</p> <p>7 Q. I'm going to hand to you Exhibit 427. For the</p> <p>8 record, it's Bates Stamped DEF -- strike that --</p> <p>9 DEF015184.</p> <p>10 (Whereupon, Exhibit 427 was marked.)</p> <p>11 BY MS. WRIGLEY:</p> <p>12 Q. Do you see this is an email to you</p> <p>13 lee@lifechangingradio.com, subject, "Mike's Documentary on</p> <p>14 Election Fraud," the date is February 5th, 2021 at</p> <p>15 6:14 p.m.</p> <p>16 Do you see that?</p> <p>17 A. Yes.</p> <p>18 Q. And this email looks similar to the previous</p> <p>19 exhibits we saw; correct?</p> <p>20 A. Yes.</p> <p>21 Q. Where you sent a link to Absolute Proof to</p> <p>22 TV/news stations along with the michaeljlindell.com link</p> <p>23 for "Random people are customers"; correct?</p> <p>24 A. Yes.</p> <p>25 Q. Who is Lee at lifechangingradio.com?</p>	<p style="text-align: right;">Page 172</p> <p>1 Q. Was this podcast doing MyPillow marketing at</p> <p>2 the time?</p> <p>3 A. Yes.</p> <p>4 Q. So the emails that we just looked at, we went</p> <p>5 through a number of them, sort of starting with</p> <p>6 Exhibit, sort of, 412 and on through Exhibit 428, I</p> <p>7 believe your testimony was you sent those at the direction</p> <p>8 or request of Mike Lindell?</p> <p>9 A. Correct.</p> <p>10 Q. And did Mr. Lindell tell you why he asked you</p> <p>11 to send the link to Absolute Proof to these radio shows or</p> <p>12 podcasters?</p> <p>13 A. He said, "Send it out to your people," so I</p> <p>14 did.</p> <p>15 Q. And by "people," that would be the radio,</p> <p>16 influencer, and podcasters you were working with on</p> <p>17 MyPillow marketing?</p> <p>18 A. Correct.</p> <p>19 Q. Okay. We looked at a number of emails to a</p> <p>20 number of people or entities.</p> <p>21 Did you send any other emails similar to those</p> <p>22 we've looked at to anyone else where you gave them a link</p> <p>23 to the Absolute Proof video?</p> <p>24 A. It's possible. I don't recall. It's over</p> <p>25 two years ago.</p>

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<p style="text-align: right;">Page 173</p> <p>1 Q. Okay. Do you remember approximately how many</p> <p>2 emails or how many of them you might have sent the</p> <p>3 Absolute Proof documentary to?</p> <p>4 A. I don't recall.</p> <p>5 Q. Okay. And looking at the emails, Ms. Curtis,</p> <p>6 do you think it's fair to say that you had a role in</p> <p>7 helping to distribute the Absolute Proof documentary?</p> <p>8 MS. OLIVER: Objection to form.</p> <p>9 You can answer.</p> <p>10 A. I don't recall them distributing it. I was</p> <p>11 sending an email as per Mike's request.</p> <p>12 BY MS. WRIGLEY:</p> <p>13 Q. And you sent the emails from your MyPillow</p> <p>14 email account?</p> <p>15 A. That is correct.</p> <p>16 Q. And the emails identified you as the marketing</p> <p>17 director for MyPillow?</p> <p>18 A. Yes.</p> <p>19 Q. When you sent the emails, did you understand</p> <p>20 that some of the individuals or radios or podcasts would</p> <p>21 be making the video of Absolute Proof available to others?</p> <p>22 A. I don't know what they were going to do with</p> <p>23 it when they received it.</p> <p>24 Q. Okay. When you sent the emails, did you</p> <p>25 understand that many of the people or entities were part</p>	<p style="text-align: right;">Page 175</p> <p>1 you see this is an email from Katelyn Gamlin at Lindell</p> <p>2 Management to you?</p> <p>3 A. Yes.</p> <p>4 Q. And it's at your mypillow.com address?</p> <p>5 A. Yes.</p> <p>6 Q. Actually, let me take a step back.</p> <p>7 Do you hold any positions with Lindell</p> <p>8 Management?</p> <p>9 A. None.</p> <p>10 Q. Okay. You're just strictly a MyPillow</p> <p>11 employee?</p> <p>12 A. That's correct.</p> <p>13 Q. Okay. The subject is, "Forward: This is the</p> <p>14 corrected one." Then I'm looking at the email at the top.</p> <p>15 Do you see that?</p> <p>16 A. Yes.</p> <p>17 Q. And the date on this is February 16th, 2021,</p> <p>18 and this is 5:43 p.m.; correct?</p> <p>19 A. Yes.</p> <p>20 Q. And then, in the email, Katelyn states,</p> <p>21 "Approved press release."</p> <p>22 Do you see that?</p> <p>23 A. Yes.</p> <p>24 Q. Now, if you look at the second page, it's got</p> <p>25 an attachment.</p>
<p style="text-align: right;">Page 174</p> <p>1 of media organizations?</p> <p>2 A. I worked with these organizations, so yes, I</p> <p>3 know who they were.</p> <p>4 Q. Okay. Did you do anything else or did you</p> <p>5 take any other steps to send the Absolute Proof</p> <p>6 documentary to anybody else besides, sort of, the media</p> <p>7 podcaster influencers?</p> <p>8 A. I don't recall. I don't believe so.</p> <p>9 Q. Okay. Did Mike Lindell ask you to do anything</p> <p>10 else to promote or encourage others to watch</p> <p>11 Absolute Proof at the time?</p> <p>12 A. No. No.</p> <p>13 Q. Did you do anything to encourage the media,</p> <p>14 radio, podcaster, influencers to publish or promote</p> <p>15 Absolute Proof?</p> <p>16 A. No.</p> <p>17 Q. I'm going to show you a couple more documents.</p> <p>18 Ms. Curtis, I'm going to hand to you another</p> <p>19 document. This one is Exhibit 429. For the record, it's</p> <p>20 Bates Stamped DEF015551, and then it has an attachment</p> <p>21 which is 015552.</p> <p>22 A. Okay.</p> <p>23 (Whereupon, Exhibit 429 was marked.)</p> <p>24 BY MS. WRIGLEY:</p> <p>25 Q. Looking at the first page of Exhibit 429, do</p>	<p style="text-align: right;">Page 176</p> <p>1 Are you at the attachment?</p> <p>2 A. Yes.</p> <p>3 Q. The attachment has at the top, "For immediate</p> <p>4 release 2/16/21."</p> <p>5 Do you see that at the top?</p> <p>6 A. Yes.</p> <p>7 Q. And then the heading for this press release</p> <p>8 states, "Cancel culture gone crazy - 2 dozen retailers</p> <p>9 drop MyPillow and attempt to punish Mike Lindell for his</p> <p>10 machine voter fraud crusade."</p> <p>11 Do you see that?</p> <p>12 A. Yes.</p> <p>13 Q. Are you familiar with this press release?</p> <p>14 A. Vaguely.</p> <p>15 Q. Do you know why Katelyn Gamlin would have been</p> <p>16 sending a press release to you at the time in February</p> <p>17 2021 on the 16th?</p> <p>18 A. I don't know.</p> <p>19 MS. OLIVER: Objection to form.</p> <p>20 You can answer.</p> <p>21 A. I don't remember.</p> <p>22 BY MS. WRIGLEY:</p> <p>23 Q. Do you see that the press release mentions</p> <p>24 cancel culture?</p> <p>25 A. Yes.</p>

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<p style="text-align: right;">Page 177</p> <p>1 Q. And then at the bottom, if you go down to a</p> <p>2 little bit do you see it mentions, in this press release,</p> <p>3 that, "Mike Lindell recently released a two-hour</p> <p>4 documentary titled Absolute Proof which he says will</p> <p>5 uncover the terrible injustices he believes happened in</p> <p>6 the 2020 election."</p> <p>7 Do you see that?</p> <p>8 A. Yes.</p> <p>9 Q. It continues, "Lindell says the presentation</p> <p>10 has been viewed over 100 million times."</p> <p>11 Do you see that?</p> <p>12 A. Yes.</p> <p>13 Q. Do you have any information about how many</p> <p>14 times Absolute Proof has been viewed?</p> <p>15 A. No, I wouldn't have any idea.</p> <p>16 Q. Do you have any -- do you have any</p> <p>17 responsibility in connection with your job at MyPillow to</p> <p>18 identify or find out how many times Absolute Proof has</p> <p>19 been viewed?</p> <p>20 A. No, I would have no idea.</p> <p>21 Q. Okay. And then, do you see at the bottom of</p> <p>22 this, the last sentence, it states, in this press release,</p> <p>23 "You can watch the full documentary Absolute Proof at</p> <p>24 www.michaelljindell.com?"</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 179</p> <p>1 at. I'm not sure.</p> <p>2 Q. Okay. I'm going to show you another document.</p> <p>3 Ms. Curtis, this one's going to be marked</p> <p>4 Exhibit 430. For the record, it's Bates Stamped</p> <p>5 DEF006165, and it goes to 6166. It's an email with an</p> <p>6 attachment.</p> <p>7 (Whereupon, Exhibit 430 was marked.)</p> <p>8 BY MS. WRIGLEY:</p> <p>9 Q. Do you see the email on the first page is from</p> <p>10 you to Kathleen Bensì at salemreps.com?</p> <p>11 A. Yes.</p> <p>12 Q. The subject is "Press release."</p> <p>13 Do you see that?</p> <p>14 A. Yes.</p> <p>15 Q. The date is February 17th, 2021 at 2:39 p.m.?</p> <p>16 A. Yes.</p> <p>17 Q. And you sent this to her from your MyPillow</p> <p>18 address?</p> <p>19 A. It looks like it, yes.</p> <p>20 Q. And you state, "Here is a press release."</p> <p>21 Do you see that?</p> <p>22 A. Yes.</p> <p>23 Q. And then if you go to the next page, do you</p> <p>24 see there's a press release where at the top it states,</p> <p>25 "For Immediate Release 2/16/21," then it has a heading,</p>
<p style="text-align: right;">Page 178</p> <p>1 Q. What is that address to, that website address?</p> <p>2 A. I don't recall. I never saw that until</p> <p>3 Absolute Proof came out.</p> <p>4 Q. Okay. Have you been on the Michael J. Lindell</p> <p>5 website?</p> <p>6 A. Recently?</p> <p>7 Q. At any point.</p> <p>8 A. Ever? I don't remember if I clicked on the</p> <p>9 link or not.</p> <p>10 Q. Okay. And did this press release go out to</p> <p>11 any media to promote or inform about the Absolute Proof</p> <p>12 documentary?</p> <p>13 A. I don't remember that. I don't remember.</p> <p>14 Q. Do you have any responsibilities in your</p> <p>15 position as marketing director for reviewing or approving</p> <p>16 or drafting press releases related to Mike Lindell?</p> <p>17 A. No.</p> <p>18 Q. Okay. And at this time, Katelyn Gamlin, it</p> <p>19 has her with an email address at Lindell Management.</p> <p>20 Do you see that?</p> <p>21 A. Yes.</p> <p>22 Q. Are you familiar with Lindell Management?</p> <p>23 A. No.</p> <p>24 Q. At the time, was she working at MyPillow?</p> <p>25 A. I don't know which capacity she was working</p>	<p style="text-align: right;">Page 180</p> <p>1 "Cancel Culture Gone Crazy - 2 Dozen Retailers Drop</p> <p>2 MyPillow in Attempt to Punish Mike Lindell For His Machine</p> <p>3 Voter Fraud Crusade."</p> <p>4 Do you see that?</p> <p>5 A. Yes.</p> <p>6 Q. And then, does this press release look to be</p> <p>7 the same as the press release we saw on the previous</p> <p>8 exhibit?</p> <p>9 A. Yes, it does.</p> <p>10 Q. Okay. And so, then, on February 17th, did you</p> <p>11 send -- then send that press release to Kathleen Bensì at</p> <p>12 Salem Reps?</p> <p>13 A. It looks like I did, yes.</p> <p>14 Q. And at that time, Ms. Bensì at Salem Reps was</p> <p>15 one of MyPillow's marketing radio, podcaster, influencers?</p> <p>16 A. Yes.</p> <p>17 Q. And at the time, why would you have been</p> <p>18 sending this to Ms. Bensì?</p> <p>19 A. Probably the same reason I sent out the</p> <p>20 Absolute Proof, as per Mike's request.</p> <p>21 Q. Okay. And did -- at the time, did</p> <p>22 Mike Lindell ever tell you that he wanted these radio,</p> <p>23 podcaster, influencers to promote the Absolute Proof</p> <p>24 documentary?</p> <p>25 A. No, he just asked me to send out the video,</p>

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<p style="text-align: right;">Page 181</p> <p>1 and I did.</p> <p>2 Q. Ms. Curtis, I'm going to hand to you what's</p> <p>3 been marked as Exhibit 431. For the record, it's</p> <p>4 Bates Stamped DEF078399.</p> <p>5 (Whereupon, Exhibit 431 was marked.)</p> <p>6 BY MS. WRIGLEY:</p> <p>7 Q. And it's got three pages, and it's an email</p> <p>8 chain from February 17th, 2021 that you're included on.</p> <p>9 Do you see that?</p> <p>10 A. Yes.</p> <p>11 Q. Okay. Walking through this email, I'm going</p> <p>12 to start from the back, the bottom email going up.</p> <p>13 Do you see that you sent an email on</p> <p>14 February 17th, 2021 at 3:38 p.m.?</p> <p>15 A. Yes.</p> <p>16 Q. And you sent it to</p> <p>17 rayrichardsonjr@wlobradio.com.</p> <p>18 Do you see that?</p> <p>19 A. Yes.</p> <p>20 Q. Who was Ray Richardson?</p> <p>21 A. He was one of our advertisers at the time.</p> <p>22 Q. One of MyPillow's advertisers?</p> <p>23 A. A radio station, yes.</p> <p>24 Q. Got it.</p> <p>25 In your email at the bottom, you wrote,</p>	<p style="text-align: right;">Page 183</p> <p>1 Q. Okay. And would you help coordinate that?</p> <p>2 A. Yes.</p> <p>3 Q. And would you help go over, either with the</p> <p>4 radio, influencer, or podcasters and Mike Lindell,</p> <p>5 probably, like, the subject matters of the topics that he</p> <p>6 would cover?</p> <p>7 A. Not necessarily topics. Mike would just say,</p> <p>8 "Hi," and then you wouldn't have to do anymore</p> <p>9 introduction. Mike can take it from there.</p> <p>10 Q. Got it.</p> <p>11 So you responded to Mr. Richardson's email on</p> <p>12 that date, and you wrote, "Let me check. Do you have a</p> <p>13 day and time in mind?"</p> <p>14 Do you see that?</p> <p>15 A. Yes.</p> <p>16 Q. And then continuing up the chain, do you see</p> <p>17 that he responds with a day, February 22nd, and some</p> <p>18 times?</p> <p>19 A. Yes.</p> <p>20 Q. You then respond; correct?</p> <p>21 A. Yes.</p> <p>22 Q. On February 17th, stating, "Would you allow</p> <p>23 him to talk about the Dominion machines?"</p> <p>24 Do you see that?</p> <p>25 A. Yes.</p>
<p style="text-align: right;">Page 182</p> <p>1 "Hello Ray, Mike has another video out which you can see</p> <p>2 at www.lindelltv.com. The video is Absolute Proof, the</p> <p>3 trailer. Please watch and share with everyone you know.</p> <p>4 Thank you so much."</p> <p>5 Do you see that?</p> <p>6 A. Yes.</p> <p>7 Q. Why did you send this email to Mr. Richardson</p> <p>8 on February 17th?</p> <p>9 A. As per Mike's request.</p> <p>10 Q. And in the email, you encouraged him to watch</p> <p>11 and share the video with everyone he knows; correct?</p> <p>12 A. That's what it says here.</p> <p>13 Q. And Mr. Richardson responded to your email;</p> <p>14 right?</p> <p>15 A. Yes.</p> <p>16 Q. And he says, "Love to get him on air next week</p> <p>17 to talk about MyPillow, his story, faith, redemption, and</p> <p>18 business, a winning combination."</p> <p>19 Do you see that?</p> <p>20 A. Yes.</p> <p>21 Q. And at this time in February of 2021, did you</p> <p>22 have any responsibility for helping arrange appearances of</p> <p>23 Mike Lindell on any of the radio, podcaster, or</p> <p>24 influencers?</p> <p>25 A. He would go on air and do interviews, yes.</p>	<p style="text-align: right;">Page 184</p> <p>1 Q. And why did you send that email at the time?</p> <p>2 A. Because we were getting canceled from</p> <p>3 everywhere because we were talking about things, Mike was,</p> <p>4 and I don't want his radio station getting in trouble and</p> <p>5 getting canceled because Mike was saying something that</p> <p>6 wasn't allowed from their station.</p> <p>7 Q. And at the time, did you understand that if</p> <p>8 Mr. Lindell went on his radio show, there was a</p> <p>9 possibility that he could talk about the Dominion</p> <p>10 machines?</p> <p>11 A. I don't know what Mike was going to talk</p> <p>12 about. I'm trying to get the radio station not to be</p> <p>13 canceled like MyPillow was canceled.</p> <p>14 Q. Okay. So he responded; correct?</p> <p>15 A. Yes.</p> <p>16 Q. He said, "Personally, I would love to do that</p> <p>17 separately. If that is required, I will."</p> <p>18 Do you see that?</p> <p>19 A. Yes, I do.</p> <p>20 Q. And you responded to Mr. Richardson stating,</p> <p>21 "That's what he is focusing on right now."</p> <p>22 Do you see that?</p> <p>23 A. I see that.</p> <p>24 Q. Is that "he" a reference to Mike Lindell?</p> <p>25 A. That's what it looks like by the email.</p>

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<p style="text-align: right;">Page 185</p> <p>1 Q. And at the time, did you understand that</p> <p>2 Mr. Lindell was focused on the Dominion machines and his</p> <p>3 appearances with media?</p> <p>4 A. I don't know what he was focusing on. I'm</p> <p>5 just telling you he didn't want to do this radio station</p> <p>6 at the moment, this interview.</p> <p>7 Q. Okay. And did Mr. Lindell appear on this</p> <p>8 radio station as was, sort of, discussed about in the</p> <p>9 email chain?</p> <p>10 A. I don't recall. This is two years ago. I</p> <p>11 don't know when he went on.</p> <p>12 Q. Does MyPillow or do you, in your position at</p> <p>13 MyPillow, keep track of all of Mr. Lindell's appearances</p> <p>14 on the -- with the radio, podcaster, or influencers?</p> <p>15 A. No, we do not.</p> <p>16 Q. Okay.</p> <p>17 THE VIDEOGRAPHER: We are going off the</p> <p>18 record. The time now is 1:07 p.m.</p> <p>19 (Discussion off the record.)</p> <p>20 THE VIDEOGRAPHER: We are going back on</p> <p>21 the record. The time now is 1:12 p.m.</p> <p>22 BY MS. WRIGLEY:</p> <p>23 Q. Ms. Curtis, in February of 2021, were you</p> <p>24 aware of any appearances by Mike Lindell on any media</p> <p>25 outlets to promote the Absolute Proof documentary?</p>	<p style="text-align: right;">Page 187</p> <p>1 8 minutes, but I won't -- we'll just listen to about</p> <p>2 2 minutes.</p> <p>3 She's going to stop it, for the record, 2:30,</p> <p>4 just in the interest of time.</p> <p>5 (Video Played:</p> <p>6 STEVE BANNON: "Dr. Ming from London tells us</p> <p>7 it's not about the competition, it's about the Chinese</p> <p>8 Communist Party being the existential threat, the</p> <p>9 existential enemy of the Chinese people, of the American</p> <p>10 people, and of all mankind. We've seen this from the CCP</p> <p>11 virus that came out of the Wuhan Lab.</p> <p>12 We're now joined, it looks like from a very</p> <p>13 exclusive club in -- somewhere in Palm Beach, Florida,</p> <p>14 been up all night, the Great Mike Lindell. Mike Lindell</p> <p>15 has made a film. It looks like a two-hour movie that's</p> <p>16 playing on a loop on One America News, I think it's up on</p> <p>17 Gab TV. It's called Absolute Proof.</p> <p>18 Mike, here's the first question. I'm going to</p> <p>19 get to the Chinese Communist Party in a second because I</p> <p>20 understand this film is very centric on CCP's involvement</p> <p>21 in the 2020 election, as the Director of National</p> <p>22 Intelligence, Ratcliffe warned the nation and warned the</p> <p>23 President in late -- in mid-January of this year.</p> <p>24 But I want to go to, look, Dominion has called</p> <p>25 your guys' bluff. You're suing Fox, which is Murdoch,</p>
<p style="text-align: right;">Page 186</p> <p>1 A. Not that I remember.</p> <p>2 Q. Did you have any role in coordinating those</p> <p>3 appearances -- any appearances by Mike Lindell to promote</p> <p>4 Absolute Proof documentary in 2021?</p> <p>5 A. I don't remember.</p> <p>6 Q. Okay. Are you aware that Mr. Lindell went on</p> <p>7 Steve Bannon's War Room podcast on February 5th, 2021 to</p> <p>8 talk about the Absolute Proof documentary?</p> <p>9 A. I don't remember that, either.</p> <p>10 Q. Have you ever seen any appearances by</p> <p>11 Mr. Lindell on Steve Bannon's War Room podcast?</p> <p>12 A. Yes.</p> <p>13 Q. At this time, I'm going to mark a</p> <p>14 February 5th, 2021 appearance of Mike Lindell on</p> <p>15 Steve Bannon's War Room podcast. Like last time, my</p> <p>16 associate is going to come around, open up the computer,</p> <p>17 and she's going to play a video of that appearance of his</p> <p>18 on the podcast. For the record, we're marking it as</p> <p>19 Exhibit 432.</p> <p>20 (Whereupon, Exhibit 432 was marked.)</p> <p>21 THE VIDEOGRAPHER: Do you want to go off</p> <p>22 the record?</p> <p>23 MS. WRIGLEY: I think we're good.</p> <p>24 THE VIDEOGRAPHER: Okay.</p> <p>25 MS. WRIGLEY: The video is about</p>	<p style="text-align: right;">Page 188</p> <p>1 where there's tough lawyers over there. They're suing all</p> <p>2 operations. I think you've gotten letters, you're</p> <p>3 involved and named in these suits.</p> <p>4 This doesn't double-down. It triples-down to</p> <p>5 the 10th power, throwing down on what they've said, your</p> <p>6 movie Absolute Proof. You don't leave any questions about</p> <p>7 this.</p> <p>8 Why -- have you reached out to Dominion</p> <p>9 executives, and have you told them, 'Hey, I'm prepared to</p> <p>10 show you this film. I'm prepared to answer questions,'</p> <p>11 and why would you throw napalm on a burning brush fire and</p> <p>12 do it this weekend before the trial next week of</p> <p>13 President Trump?</p> <p>14 MIKE LINDELL: Well, the first question is,</p> <p>15 no, I don't respond to Dominion other than, 'Yes, please</p> <p>16 sue me.' They've sent me a letter yesterday because they</p> <p>17 heard about this documentary. They sent me an email. It</p> <p>18 wasn't from lawyers, it was from them, going, 'Mike, look</p> <p>19 at all these people that we have here. They're all</p> <p>20 discredited.' Well, the people I have in this are all</p> <p>21 people that weren't on that live. So this is all the new</p> <p>22 evidence I've been telling everybody about. This is what</p> <p>23 they're so afraid of, Steve.</p> <p>24 Just today, when this launched this morning,</p> <p>25 we've got over a million people view it, and it has been</p>

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<p style="text-align: right;">Page 189</p> <p>1 taken down on Vimeo and it's been taken down on other two 2 sites, crashing. They're trying to attack it from every 3 angle. You know what? If Dominion and Smartmatic -- and 4 don't forget Smartmatic, they're right in there, I think 5 they're the other ones that went after Fox. They're not 6 coming after me because they know what -- they know this 7 movie is out. 8 So, you know, I invite you guys, Dominion and 9 that, come on, let's talk about it, you know, show me 10 what's wrong in this video because it's 100 percent 11 proof." (Video Stopped.) 12 BY MS. WRIGLEY: 13 Q. Have you ever seen that appearance by 14 Mr. Lindell on Steve Bannon's War Room podcast? 15 A. I don't recall seeing this one, no. 16 Q. Okay. Would you've discussed this appearance 17 by Mr. Lindell before he went on Mr. Bannon's War Room 18 show? 19 A. No. 20 Q. At this time -- and this video is from 21 February 5th, 2021 -- was Mr. Bannon or the War Room 22 podcast promoting or advertising any MyPillow products? 23 A. He's been advertising MyPillow for a few 24 years. I don't know what date he started. 25 Q. And at this time, would he have had</p>	<p style="text-align: right;">Page 191</p> <p>1 A. No, I'm not aware of that. 2 Q. Did you have any role or responsibility in 3 connection with any efforts to get OAN to play the 4 Absolute Proof documentary? 5 A. No. 6 Q. In your job as marketing director, do you have 7 any interactions with One America News Network? 8 A. No, I do not. 9 Q. Okay. Is there anybody at MyPillow that has 10 interactions with One America News Network? 11 A. Not to my knowledge. 12 Q. Okay. To your knowledge, in 2021, was 13 MyPillow doing any advertising on One America News 14 Network? 15 A. I don't know that. Not that I dealt with. 16 Q. Were there any media personalities connected 17 with One America News Network that were part of, in 2021, 18 MyPillow's radio, podcaster, or influencer list? 19 A. I don't know who was on One America News that 20 I worked with. I'm not sure which platforms they were on 21 at all. 22 Q. Okay. 23 A. So I'm not sure. 24 Q. Okay. And Mr. Lindell, I think you heard -- 25 did you hear he had mentioned Smartmatic in this</p>
<p style="text-align: right;">Page 190</p> <p>1 promo codes assigned to him? 2 A. Yes. 3 Q. Okay. And on this -- strike that. 4 Would there be records of MyPillow's 5 associated with any sales of MyPillow products that were 6 generated through the use of promo codes assigned to 7 Steve Bannon or War Room? 8 A. We have -- as soon as this promo code is 9 active, we would have the sales from that, and I'm not 10 sure what date that was. 11 Q. Okay. And so, if he had a promo code assigned 12 to him as of this date on February 5th, 2021, would there 13 be records of MyPillow to figure out whether or not he had 14 generated any sales from MyPillow on that date or the 15 dates thereafter? 16 A. Yes, as soon as the promo code becomes active, 17 we see results. 18 Q. Okay. Now, in the -- in this podcast, 19 Mr. Bannon mentions that Absolute Proof was playing on a 20 loop on One America News. 21 Is that something you're familiar with? 22 A. I know of the program. I don't deal with it. 23 Q. Okay. At the time, in February of 2021, were 24 you aware that One America News had played Mike Lindell's 25 Absolute Proof documentary on a loop at the time?</p>	<p style="text-align: right;">Page 192</p> <p>1 appearance on Steve Bannon's War Room podcast from 2 February 5th, 2021; correct? 3 A. Yes, I just heard that. 4 Q. Okay. And in February 5th -- or strike that. 5 In February of 2021, were you aware that 6 Mike Lindell was mentioning Smartmatic in connection with 7 election fraud for the 2020 Presidential Election? 8 A. I heard him do shows, yes, when he was on a 9 radio show or something, uh-huh. 10 Q. In February of 2021, were you aware that 11 Mike Lindell was also mentioning a different company, 12 Dominion, in connection with the election fraud for the 13 2020 Presidential Election? 14 A. I heard their name, yes. 15 Q. And did you ever discuss with any of the 16 radio, podcaster, or influences [sic] in 2021 17 Mike Lindell's allegations regarding either Smartmatic or 18 the other company, Dominion, in connection with the 2020 19 Presidential Election? 20 MS. OLIVER: Objection to form. 21 A. I don't remember that. 22 BY MS. WRIGLEY: 23 Q. Would you have discussed it with any entity 24 advertising for MyPillow in 2021? 25 A. Not to my knowledge, no.</p>

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<p style="text-align: right;">Page 193</p> <p>1 Q. Did any radio, podcaster, or influences [sic]</p> <p>2 in 2021 ever raise concerns with you, as the marketing</p> <p>3 director of MyPillow, about Mr. Lindell appearing on their</p> <p>4 shows and making allegations about either Smartmatic or</p> <p>5 the other company, Dominion, in connection with stealing</p> <p>6 the 2020 Presidential Election?</p> <p>7 A. Not to my knowledge. I don't recall.</p> <p>8 Q. Okay. Were you ever concerned at the time</p> <p>9 that any radio, podcaster, or influences [sic] would stop</p> <p>10 marketing MyPillow products because of Mr. Lindell's</p> <p>11 allegations about election fraud in connection with the</p> <p>12 2020 Presidential Election?</p> <p>13 A. It wasn't my concern if they wanted to stick</p> <p>14 with us or leave.</p> <p>15 Q. Okay. Did any radio, podcasters, or</p> <p>16 influences [sic] in 2021 decide to stop advertising</p> <p>17 MyPillow products, any of them that you worked with,</p> <p>18 because of Mr. Lindell's election fraud allegations?</p> <p>19 A. I don't recall.</p> <p>20 Q. Mr. Bannon, I think in the video that we</p> <p>21 mentioned -- or that we just watched, had mentioned that</p> <p>22 the Absolute Proof documentary was on Gab.</p> <p>23 Do you know what Gab is?</p> <p>24 A. I don't do any social media whatsoever. I'm</p> <p>25 not on it. I've heard of it, but I've never been on it.</p>	<p style="text-align: right;">Page 195</p> <p>1 Q. Okay. What is the revenue split between</p> <p>2 Mr. Bannon and MyPillow?</p> <p>3 A. I think it's 25 percent.</p> <p>4 Q. Okay.</p> <p>5 A. Just like everyone else.</p> <p>6 Q. And does Mr. Bannon get compensated on a</p> <p>7 monthly basis for any MyPillow sales generated?</p> <p>8 A. He does.</p> <p>9 Q. Okay. And has Mr. Bannon been regularly</p> <p>10 compensated on a monthly basis from 2021 through present</p> <p>11 for generating MyPillow sales?</p> <p>12 A. Like I stated, as soon as he became -- the</p> <p>13 promo code became active is when he's been paid for it.</p> <p>14 Q. Okay. I'm going to mark another video, so</p> <p>15 give me one second. This one will be Exhibit 433, and my</p> <p>16 colleague is going to come around and play you another</p> <p>17 one. This one actually is not a video -- it's audio.</p> <p>18 And for the record, this is a February 6th,</p> <p>19 2021 audio of the entire podcast from Steve Bannon's</p> <p>20 War Room, and in the course of this, Mike Lindell appears.</p> <p>21 Again, this one is long, I think it's over -- at least</p> <p>22 over 30 minutes, so we're just going to play a couple</p> <p>23 portions, then I'll ask you some questions.</p> <p>24 And then, for the record, this is the whole</p> <p>25 podcast. I'm going to have my colleague go to the spot at</p>
<p style="text-align: right;">Page 194</p> <p>1 Q. Okay. Mr. Lindell, in that appearance, also</p> <p>2 mentioned Absolute Proof could be found on</p> <p>3 michaeljlindell.com.</p> <p>4 That's the website that you had sent around as</p> <p>5 well, in the previous exhibits, to a number of the radio,</p> <p>6 influencers, and podcasts; correct?</p> <p>7 A. Correct.</p> <p>8 Q. Okay. And was Absolute Proof up on that</p> <p>9 website in February of 2021?</p> <p>10 A. I don't recall.</p> <p>11 Q. Okay. In terms of Steve Bannon or War Room,</p> <p>12 in 2021, was Mr. Bannon being compensated for any MyPillow</p> <p>13 marketing through a cash buy or a percentage of revenue</p> <p>14 generated?</p> <p>15 A. I don't know when he started. He's been</p> <p>16 advertising for us for a while. I don't know when he</p> <p>17 started.</p> <p>18 Q. Okay. Would there be records at MyPillow to</p> <p>19 identify, kind of, any compensation or payment made to</p> <p>20 Mr. Bannon for MyPillow advertising in 2021?</p> <p>21 A. I would imagine accounting would have that.</p> <p>22 Q. Okay. And would they be able to identify</p> <p>23 whether he got paid via cash buys or a percentage of a</p> <p>24 revenue split?</p> <p>25 A. He's only been paid on revenue split.</p>	<p style="text-align: right;">Page 196</p> <p>1 27 minutes, 53 seconds. That's the place where</p> <p>2 Mr. Lindell first appears, and then I'll have her play up</p> <p>3 through minute 30:22. So we'll just watch a couple</p> <p>4 minutes of his appearance on this podcast.</p> <p>5 (Whereupon, Exhibit 433 was marked.)</p> <p>6 (Video Played:</p> <p>7 STEVE BANNON: "All of Hunter Biden, the guy</p> <p>8 just got a \$2-million advance for selling us out to the</p> <p>9 Chinese Communist Party; right? We had -- we had the wire</p> <p>10 transfers, we had the receipts, we had the joint venture</p> <p>11 agreement, we had the retainer agreement, and all that.</p> <p>12 We tweeted it out constantly, non-stop on the War Room</p> <p>13 Twitter, and they took it down. Of course, they said,</p> <p>14 'Oh, we took it down because you were about Dr. Fauci.'</p> <p>15 SPEAKER: "Twitter's valuation would fall too</p> <p>16 much if they took me off."</p> <p>17 MS. WRIGLEY: Let's stop for a second.</p> <p>18 Hang on.</p> <p>19 (Discussion off the record.)</p> <p>20 (Audio Played:</p> <p>21 STEVE BANNON: "All of Hunter Biden, the guy</p> <p>22 just got a \$2-million advance for selling us out to the</p> <p>23 Chinese Communist Party; right? We had -- we had the wire</p> <p>24 transfers, we had the receipts, we had the joint venture</p> <p>25 agreement, we had the retainer agreement, and all that.</p>

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<p style="text-align: right;">Page 197</p> <p>1 We tweeted it out constantly, non-stop on the War Room</p> <p>2 Twitter, and they took it down. Of course, they said,</p> <p>3 'Oh, we took it down because you were about Dr. Fauci.'</p> <p>4 SPEAKER: Twitter's valuation would fall too</p> <p>5 much if they took me off.</p> <p>6 STEVE BANNON: Exactly.</p> <p>7 So I want to go now and get Mike Lindell.</p> <p>8 Mike, first off, I want to ask you, just so people</p> <p>9 understand this, you -- from concept to completion, how</p> <p>10 long was it that you took to put your two-hour film</p> <p>11 together?</p> <p>12 MIKE LINDELL: About six -- six days, and that</p> <p>13 was a big crew. We were working about 21 hours a day.</p> <p>14 Brannon and -- Brannon Howse, and it's just an amazing</p> <p>15 place we put it together. And they worked -- that's</p> <p>16 editing, that's everything, and it's beautiful. I know</p> <p>17 the media tried to make it -- they tried to bash it, that</p> <p>18 they did it in six hours. Well, if you look at it, you</p> <p>19 would have thought it was -- you would have thought it</p> <p>20 was, you know, done in three months because it's so well</p> <p>21 done.</p> <p>22 STEVE BANNON: Yeah, I want to get to the</p> <p>23 media bashing in a second. But I want to go to, how many</p> <p>24 people do you estimate -- and walk us through how you get</p> <p>25 to this estimate -- how many people do you estimate have</p>	<p style="text-align: right;">Page 199</p> <p>1 FBI step in?' I mean, if this was, you know, and all the</p> <p>2 stuff that was out there, and I guess they're amazed.</p> <p>3 They're like, what? You know?</p> <p>4 And you got to realize, a lot of this came</p> <p>5 out, you know, it was just exposed in, at least, for</p> <p>6 myself was January 9th." (Audio stopped.)</p> <p>7 BY MS. WRIGLEY:</p> <p>8 Q. Have you seen that appearance by Mike Lindell</p> <p>9 on Steve Bannon's War Room podcast from February 6th,</p> <p>10 2021?</p> <p>11 A. I don't recall seeing that one.</p> <p>12 Q. Would you have discussed that appearance with</p> <p>13 Mr. Lindell before he went on the War Room show?</p> <p>14 A. No.</p> <p>15 Q. Would you help coordinate his appearance on</p> <p>16 the War Room show?</p> <p>17 A. No.</p> <p>18 Q. Okay. He had mentioned a number --</p> <p>19 Mr. Lindell, in the portion that we saw, mentioned a</p> <p>20 number of people had seen Absolute Proof and a tracker on</p> <p>21 the website.</p> <p>22 Are you familiar with any tracker on the</p> <p>23 website that identifies the number of people that have</p> <p>24 watched Absolute Proof?</p> <p>25 A. I don't have access to any of that.</p>
<p style="text-align: right;">Page 198</p> <p>1 seen it since it started playing yesterday at 10 o'clock</p> <p>2 in the morning on One America News? How many people do</p> <p>3 you estimate have seen this?</p> <p>4 MIKE LINDELL: Well, I know over 5 million</p> <p>5 have watched it to completion. We have a tracker on that.</p> <p>6 But that's just on -- that's just on my site; okay? So</p> <p>7 there's, -I mean, where it went far and wide, I don't</p> <p>8 know, but over 10 million we can account for that have</p> <p>9 actually looked at it. We don't know how long they've</p> <p>10 seen it, you know, how long they watched it in entirety,</p> <p>11 but that number, the average watch time on my specific</p> <p>12 michaeljlindell.com is an hour and 53 minutes. Well, it's</p> <p>13 only two hours long.</p> <p>14 STEVE BANNON: How are people getting</p> <p>15 feedback? Do you have a live chat that they can go to to</p> <p>16 put comments? I mean, what's generally the feedback? I</p> <p>17 mean, obviously, you hope that more than just people that</p> <p>18 follow War Room and others go see it.</p> <p>19 What kind of feedback are you getting so far</p> <p>20 from people? I'm going to get to the media and to your</p> <p>21 opposition in a second.</p> <p>22 MIKE LINDELL: Right, right.</p> <p>23 Everybody is like, 'Mike, why didn't this come</p> <p>24 out sooner? Why -- you know, why didn't anybody do</p> <p>25 anything about it? Why didn't -- why didn't the DOJ and</p>	<p style="text-align: right;">Page 200</p> <p>1 Q. Do you have any responsibilities with tracking</p> <p>2 the number of people who have seen Absolute Proof?</p> <p>3 A. No, I do not.</p> <p>4 Q. At this time, would Mr. Bannon or the War Room</p> <p>5 podcast have been doing any marketing or promoting of</p> <p>6 MyPillow products?</p> <p>7 A. I don't know. I don't know when he started.</p> <p>8 Q. Okay. I want to show you another segment of</p> <p>9 Mr. Lindell's appearance. For the record, I'm going to</p> <p>10 have my colleague go to the portion in the video at minute</p> <p>11 42:40 and then have her play until 42:58. So we'll just</p> <p>12 watch a few.</p> <p>13 (Video Played:</p> <p>14 STEVE BANNON: -- or the Recovery Network</p> <p>15 since you launched this?</p> <p>16 MIKE LINDELL: Well, the -- we've had -- we've</p> <p>17 had churches that actually were going to come on board and</p> <p>18 then the Recovery Network and there -- there has been, and</p> <p>19 all of a sudden, they don't answer our calls, but</p> <p>20 that's -- you know, they're just afraid of cancel culture.</p> <p>21 And my employees know -- I want to tell you</p> <p>22 this. All my employees have just stepped it up. And one</p> <p>23 of them even said, 'Mike, why don't you do -- you're going</p> <p>24 on the show today. Use Promo Code PROOF.' So if you</p> <p>25 want -- any of the listeners out there, if you want to use</p>

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<p style="text-align: right;">Page 201</p> <p>1 Promo Code PROOF, save up to 66 percent off my stuff on 2 MyPillow.com. My employees, we're up to 27 -- over 2,700 3 now. We're getting busier." (Audio stopped.) 4 BY MS. WRIGLEY: 5 Q. I'm going to ask you about that portion of 6 Mr. Lindell's appearance. 7 Would you have discussed or had anything to do 8 with Mr. Lindell referencing or using a promo code on that 9 February 6th, 2021 appearance of his on the Bannon's 10 War Room podcast? 11 A. No, and that's not Steve's promo code. So he 12 absolutely wasn't advertising for us at the time. 13 Q. Okay. Would you have had knowledge about that 14 promo code before Mr. Lindell referenced it on this 15 podcast? 16 A. No. 17 Q. Okay. Once Mr. Lindell references a 18 promo code that can be used for MyPillow products, would 19 he have communicated that information to you to do 20 anything with it in the MyPillow system? 21 A. Either me or Nick Dressen, who's also sent 22 promo codes. I don't recall setting it up. 23 Q. Okay. Let me ask you this: 24 Did you ever set up a Promo Code PROOF, 25 P-R-O-O-F, to be used in connection with the sale of</p>	<p style="text-align: right;">Page 203</p> <p>1 right? 2 A. That's correct. 3 Q. What are the promo codes that Mr. Bannon or 4 War Room uses for MyPillow products? 5 A. WARROOM. 6 Q. Is it just WARROOM? 7 A. That's correct. 8 Q. And does he have any other codes besides 9 WARROOM? 10 A. That's all. 11 Q. Okay. And then how often does Mr. Bannon do 12 spots for MyPillow products -- I would say during the time 13 period 2020 up through present, how often does Mr. Bannon 14 do spots for MyPillow products on War Room? 15 A. Because they get a percentage, they can do 16 one, they can do ten. I don't know. I don't listen to 17 his show every day, so I don't know how many he does. 18 Q. Okay. I'm going to mark another document. 19 We'll move on from that. 20 (Whereupon, Exhibit 434 was marked.) 21 BY MS. WRIGLEY: 22 Q. Ms. Curtis, I'm going to hand you what's been 23 marked as Exhibit 4 -- or I'm sorry. 24 THE REPORTER: 434. 25 MS. WRIGLEY: 434, thank you. I forgot</p>
<p style="text-align: right;">Page 202</p> <p>1 MyPillow products? 2 A. I don't recall setting it up at all. 3 Q. Is there a Promo Code PROOF that's used in 4 connection with MyPillow products? 5 A. There's a Promo Code PROOF that sold -- it's 6 active. I don't know what it's sold, though, so I 7 can't -- 8 Q. Okay. Is the information related to any sales 9 generated with the use of the Promo Code PROOF available 10 in any system that you have access to at MyPillow? 11 A. I would imagine just like any other 12 promo code -- 13 Q. Just like -- 14 A. -- yes. 15 Q. Just like any other promo code, you could go 16 on the system and figure out, at any point in time, how 17 much revenue from sales of MyPillow products have been 18 generated with the use of the Promo Code PROOF? 19 A. Yes. 20 Q. Okay. And PROOF would not have been a 21 promo code term that you came up with; correct? 22 A. I didn't come up with it. Like I said, I 23 never set it up. 24 Q. Okay. Now, at this time, you had said PROOF 25 wasn't, like, a Bannon or a War Room promo code; is that</p>	<p style="text-align: right;">Page 204</p> <p>1 a couple of numbers. 2 BY MS. WRIGLEY: 3 Q. You've got 434. I'll represent to you for the 4 record, you're not on this document. This is a document 5 that was prepared and given to us by the defendants in 6 this case as part of the litigation process. 7 The title of this is, "Defendant MyPillow, 8 Inc.'s Supplemental Answers and Objections to Plaintiffs' 9 Second Set of Interrogatories." 10 Interrogatories in a case are questions that 11 one side asks, and then the other side has to give written 12 answers, and I've got a question and answer that MyPillow 13 provided in this document that I want to ask you about. 14 A. Okay. 15 Q. I'm just going to the last page of this 16 document, page 6. 17 Do you see this is a verification page? 18 A. Yes. 19 Q. And do you see that this page identifies a 20 signator as Mike J. Lindell with a date of January 11th, 21 2023. 22 Do you see that? 23 A. Yes. 24 Q. And do you see under the verification, it 25 says, "I declare under penalty of perjury that everything</p>

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<p style="text-align: right;">Page 205</p> <p>1 I've stated in this document is true and correct?"</p> <p>2 Do you see that?</p> <p>3 A. Yes.</p> <p>4 Q. I want to ask you about one of the questions</p> <p>5 and answers that is on page 3. At the very top, do you</p> <p>6 see where it states, "Interrogatory Number 18"?</p> <p>7 A. Yes.</p> <p>8 Q. That interrogatory states as follows:</p> <p>9 "Identify all MyPillow employees or third</p> <p>10 parties involved in the creation, development, or use of</p> <p>11 the MyPillow promotional codes, FIGHTFORTRUMP, PROOF,</p> <p>12 ERIC, ML66, ML33, and any other MyPillow promo codes used</p> <p>13 in the accused program's defamatory broadcasts, defamatory</p> <p>14 statements, and/or Lindell appearances." And then it has</p> <p>15 a footnote.</p> <p>16 Do you see that?</p> <p>17 A. Yes.</p> <p>18 Q. And then, if you look down, there's an answer</p> <p>19 below.</p> <p>20 That answer states, "Defendant objects to this</p> <p>21 interrogatory to the extent that it seeks information</p> <p>22 that's not relevant to any party's claims or defenses.</p> <p>23 Subject to the following -- or subject to the foregoing,</p> <p>24 Mr. Lindell was responsible for approving the</p> <p>25 promotional codes which were developed in conjunction with</p>	<p style="text-align: right;">Page 207</p> <p>1 were identified or used by any radio, podcaster, or</p> <p>2 influencers would you have been the MyPillow employee</p> <p>3 responsible for inputting those codes into the MyPillow</p> <p>4 system so purchasers could apply the codes and receive</p> <p>5 discounts on products?</p> <p>6 A. I set up the majority of them, yes.</p> <p>7 Q. Who else would have been responsible for</p> <p>8 setting them up?</p> <p>9 A. Nick Dressen has set up a few.</p> <p>10 Q. Okay. Who else?</p> <p>11 A. That's probably just it.</p> <p>12 Q. And would you have set up those codes as part</p> <p>13 of your job responsibilities at MyPillow?</p> <p>14 A. Yes.</p> <p>15 Q. Okay. And then what is the system that they</p> <p>16 get inputted in?</p> <p>17 A. In Annaware and Magento.</p> <p>18 Q. Annaware and Magento?</p> <p>19 A. Uh-huh.</p> <p>20 Q. Okay. You can put that aside.</p> <p>21 I'm going to play another video for you. This</p> <p>22 one's going to be marked Exhibit 435. Once again, my</p> <p>23 colleague's going to come around and put the flash drive</p> <p>24 in and play this video.</p> <p>25 For the record, this is an appearance -- it</p>
<p style="text-align: right;">Page 206</p> <p>1 influencers and posts where applicable. A MyPillow</p> <p>2 employee was responsible for inputting the promotional</p> <p>3 codes into the MyPillow system so purchasers could apply</p> <p>4 the codes and receive discounts on products. Discovery</p> <p>5 continues."</p> <p>6 Do you see that?</p> <p>7 A. Yes.</p> <p>8 Q. And I want to ask you about that sentence that</p> <p>9 represents a MyPillow employee.</p> <p>10 As a MyPillow employee in 2021, did you have</p> <p>11 any responsibility for inputting promotional codes into</p> <p>12 the MyPillow system?</p> <p>13 A. Yes.</p> <p>14 Q. And did you input promotional -- did you input</p> <p>15 a promotional code into the MyPillow system that was</p> <p>16 FIGHTFORTRUMP?</p> <p>17 A. I don't recall that one.</p> <p>18 Q. How about PROOF?</p> <p>19 A. I don't recall setting that one up.</p> <p>20 Q. How about ERIC?</p> <p>21 A. ERIC was set up long ago for Eric Metaxas.</p> <p>22 Q. What about ML66?</p> <p>23 A. ML66 and 33 were set up just Mike's initials,</p> <p>24 long ago when he started the company.</p> <p>25 Q. Okay. And in 2021, if any promotional codes</p>	<p style="text-align: right;">Page 208</p> <p>1 has a video from the -- a show Real America with Dan Ball</p> <p>2 on OAN with an appearance by Mike Lindell from</p> <p>3 February 8th, 2021. It's over 7 minutes, but once again,</p> <p>4 we're going to watch a little bit -- we'll play it from</p> <p>5 the beginning up to 2 minutes and 35 seconds in the</p> <p>6 interest of time.</p> <p>7 (Whereupon, Exhibit 435 was marked.)</p> <p>8 (Video Played:</p> <p>9 DAN BALL: "Welcome back. Time now to get</p> <p>10 real. It's a Friday. Once again, we're going to change</p> <p>11 all things up. I invited somebody on to help me out, and</p> <p>12 in this Get Real, we're going to get real about the term</p> <p>13 'election fraud' because if you say it now -- the election</p> <p>14 is over -- people attack you, Twitter, Facebook, Instagram</p> <p>15 bans you, your friends -- maybe your friends -- strangers,</p> <p>16 who knows, co-workers will dox you; right? You can't say</p> <p>17 the phrase. So if you've been watching OAN, right before</p> <p>18 this program you saw a special documentary that was</p> <p>19 produced by the CEO of MyPillow, Mike Lindell. He put a</p> <p>20 lot of money, thought, and time into this. He went around</p> <p>21 the nation collecting evidence that he believes proves</p> <p>22 there was voter fraud and election fraud. Whether you</p> <p>23 believe it or not -- and we know what the left's going to</p> <p>24 say, 'Oh, you're inciting violence by even saying the</p> <p>25 phrase.' No, I think, in America, you still have free</p>

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<p style="text-align: right;">Page 209</p> <p>1 speech. So anybody to the left that says that OAN 2 shouldn't be airing this or that we shouldn't even use the 3 phrase or term "election fraud," sorry, it's called free 4 speech. So joining me now the CEO of MyPillow, 5 Mike Lindell to wrap our show up today. 6 Mike, we're going to be airing this 7 Absolute Proof two-hour documentary. It just aired before 8 this program. It's going to air all weekend long. You 9 paid for this. These aren't the views we're expressing on 10 this network, but my opinion is, my personal ones, Dan 11 Ball, the host -- because I can have an opinion, it's 12 called free speech -- is that, yeah, there was election 13 and voter fraud. The major networks even said there was, 14 they just said, 'Not enough to overturn it.' But that's 15 the question; we don't know if there's enough because they 16 never let us investigate and see the servers and see the 17 machines and see the ballots and the envelopes. 18 So tell folks if they didn't view it yet what 19 they're going to see in this two-hour documentary that you 20 produced. 21 MIKE LINDELL: What they're going to see is 22 something they've never heard before and never seen, and 23 that's cyber forensics footprints. They're going -- 24 they're going to see in there which country it came from, 25 the ID of the computer, the IP address where it came over</p>	<p style="text-align: right;">Page 211</p> <p>1 Q. Okay. Would you have discussed this 2 appearance by Mr. Lindell on Real America with Dan Ball 3 from OAN? 4 A. No, because I didn't know he did it. 5 Q. Okay. Okay. Would he have discussed this 6 appearance with anybody at MyPillow at the time? 7 A. Not to my knowledge. 8 Q. Okay. Okay. In the video, they mentioned 9 that the playing of Absolute Proof on OAN had been paid. 10 Do you have any knowledge about whether 11 MyPillow made any payments to OAN to publish 12 Absolute Proof? 13 A. I don't know that. 14 Q. Okay. Did you have any involvement in that? 15 A. None. 16 Q. Okay. I'm going to hand you another document. 17 (Whereupon, Exhibit 436 was marked.) 18 BY MS. WRIGLEY: 19 Q. This is marked Exhibit 436. For the record, 20 this was marked to the Supplemental Complaint in this case 21 as Exhibit 15, that's why this exhibit cover sheet is on 22 the top. 23 And for the record, I'll represent that these 24 are screenshots taken of a screening and appearance of 25 Mike Lindell with Steve Bannon related to Absolute Proof</p>
<p style="text-align: right;">Page 210</p> <p>1 here, the IP address of their computer broke into here, 2 the actual ID number of the computer, and then, how many 3 votes were flipped, whether they got internet -- it's a 4 cyber footprint. It's what the government uses. 5 When they -- if you did an investigation, this 6 is what you'd be looking for for that night. We have them 7 from November 1st all the way through the election. It 8 shows a massive attack on our country by China, and other 9 country. China did 60 percent of this. It was all done 10 through Dominion machines and Smartmatic machines. That 11 was the tool they used, and you know, you said it before 12 there right at the top of the show." (Video stopped.) 13 BY MS. WRIGLEY: 14 Q. Have you seen this appearance by Mr. Lindell 15 on Dan Ball? 16 A. I have not. 17 Q. Okay. Are you familiar with Dan Ball at OAN? 18 A. No, I'm not. 19 Q. Is Dan Ball or his show one of the radio, 20 media -- or radio, podcaster, influencers that you work 21 with at MyPillow? 22 A. Not that I work with, no. 23 Q. Okay. Do you know whether OAN had been 24 promoting or advertising MyPillow products at this time? 25 A. I am not aware.</p>	<p style="text-align: right;">Page 212</p> <p>1 that was put on the OAN Network from February 11th, 2021. 2 Just take a few minutes. 3 I'll walk through -- and the first page you 4 see has a screenshot A, and this is -- got a picture of 5 Mr. Lindell and Mr. Bannon, and it shows the cover of 6 Absolute Proof, and it states, "A screening and 7 conversation of Absolute Proof with Mike Lindell hosted by 8 Steve Bannon." 9 Do you see that? 10 A. I do. 11 Q. And then, for the record, this goes with 12 Exhibit 15 to the Supplemental Complaint, which was a 13 publication from February 11th, 2021, and this screenshot 14 appears at 2nd-one. And then, if you look at the next 15 one, it's got a screenshot of a picture of Mr. Bannon, and 16 at the bottom of the screenshot, it indicates the time 17 that it appears. Same thing for the next screenshot C, it 18 shows Mr. Lindell and Mr. Bannon at the bottom of that. 19 It also indicates the minute and second that this appears. 20 At the next page, it's got Mr. Lindell with 21 another individual and an image of the Absolute Proof 22 cover with the time marked, and then it kind of continues 23 through the rest of the exhibit with some screenshots that 24 were taken at a particular point in time from this 25 screening of Absolute Proof between Lindell and</p>

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<p style="text-align: right;">Page 213</p> <p>1 Steve Bannon.</p> <p>2 Are you familiar with this from -- that</p> <p>3 occurred in February of 2021?</p> <p>4 A. I am not.</p> <p>5 Q. Okay. Would you have -- would you have been</p> <p>6 aware of any appearances by Mike Lindell to have a</p> <p>7 conversation like this with Steve Bannon about</p> <p>8 Absolute Proof at the time?</p> <p>9 A. No.</p> <p>10 Q. Okay. Would you have done anything to</p> <p>11 coordinate appearances by Mike Lindell --</p> <p>12 A. No.</p> <p>13 Q. -- with Mr. Bannon?</p> <p>14 A. No.</p> <p>15 Q. At this time, would you have been aware of</p> <p>16 whether Mr. Bannon was promoting or advertising MyPillow</p> <p>17 products?</p> <p>18 A. Obviously, not by looking at the video prior</p> <p>19 to this. He used Promo Code PROOF. That's not his</p> <p>20 promo code.</p> <p>21 Q. What about -- this is on -- this one's from</p> <p>22 February 11th.</p> <p>23 Do you know whether Mr. Bannon would have been</p> <p>24 advertising MyPillow products around this time?</p> <p>25 A. I'm not aware, no.</p>	<p style="text-align: right;">Page 215</p> <p>1 January 6th, 2021.</p> <p>2 Does this appear to be, sort of, picking up on</p> <p>3 that same date?</p> <p>4 A. If I look back.</p> <p>5 Q. Yeah, so if you look at the last page of</p> <p>6 Exhibit 410, second-to-last page, it has a date of</p> <p>7 January 6th, 2021.</p> <p>8 A. Yes.</p> <p>9 Q. And the last text on that page is from</p> <p>10 Mike Lindell at 9:18 p.m., and then there's another one at</p> <p>11 9:18 p.m. on the last page, page 203, and then if you</p> <p>12 switch over to Exhibit 3 -- 437, it picks up on</p> <p>13 January 6th, 2021 with a text from Mike Lindell at</p> <p>14 9:18 p.m.</p> <p>15 Do you see that?</p> <p>16 A. Yes. Yes.</p> <p>17 Q. Okay. Great.</p> <p>18 I want to turn your attention to -- just so</p> <p>19 you know, this one -- the page numbers are a part of the</p> <p>20 Bates stamp, and it goes from 1, and then the last page of</p> <p>21 these texts is 145. So when I call it a page number,</p> <p>22 that's what I'll be referring to.</p> <p>23 A. Yes.</p> <p>24 Q. I'll have you turn to page 18. Actually, I'll</p> <p>25 have you go to the page before, page 17, if you don't</p>
<p style="text-align: right;">Page 214</p> <p>1 Q. Okay. You can put that aside. I'm going to</p> <p>2 probably show you another exhibit.</p> <p>3 (Whereupon, Exhibit 437 was marked.)</p> <p>4 BY MS. WRIGLEY:</p> <p>5 Q. Ms. Curtis, I'm going to hand to you what's</p> <p>6 been marked as Exhibit 437. It's a spiral-bound exhibit</p> <p>7 because it's large. It's Bates Stamped DEF034384. These</p> <p>8 are texts produced by the defendants in these -- in this</p> <p>9 case.</p> <p>10 The date of these, on the first page, is shown</p> <p>11 as January 6th, 2021, and if you look at the last page of</p> <p>12 this document, on the last page of this document, the last</p> <p>13 date for this production of texts ends on July 28th, 2021.</p> <p>14 I'm looking at the front.</p> <p>15 Does this appear to be texts between you and</p> <p>16 Mr. Lindell?</p> <p>17 A. Yes.</p> <p>18 Q. And you recognize that as your phone number on</p> <p>19 the first page at the top left?</p> <p>20 A. Yes.</p> <p>21 Q. And do you recognize that to be Mr. Lindell's</p> <p>22 phone number at the top?</p> <p>23 A. Yes.</p> <p>24 Q. Okay. And I think we looked at a series of</p> <p>25 texts in a previous, Exhibit 410, that ended on</p>	<p style="text-align: right;">Page 216</p> <p>1 mind.</p> <p>2 If you look at page 17, do you see in the</p> <p>3 middle -- or a little bit past the middle of that page,</p> <p>4 it's got a date February 5th, 2021.</p> <p>5 Do you see that?</p> <p>6 A. Yes.</p> <p>7 Q. And then on the right side, it's got a text</p> <p>8 from Mr. Lindell to yourself. Mr. Lindell says, "Pay</p> <p>9 Brannon by wire from now on. Mary has another 12K coming</p> <p>10 from a show where we used Mike. Pay it separate, but ask</p> <p>11 Brannon for her address."</p> <p>12 Do you see that?</p> <p>13 A. Yes.</p> <p>14 Q. And then, you responded to him on that same</p> <p>15 day saying, "Okay. I will also get his wire information."</p> <p>16 Do you see that?</p> <p>17 A. Yes.</p> <p>18 Q. Okay. Before we talk a little bit more</p> <p>19 about -- I'm going to ask you some questions real quick</p> <p>20 before I move on.</p> <p>21 Who's Brannon?</p> <p>22 A. I would imagine it's Brannon Howse.</p> <p>23 Q. Okay. Are you familiar with Brannon Howse?</p> <p>24 A. A little bit.</p> <p>25 Q. And how are you familiar with Mr. Howse?</p>

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<p style="text-align: right;">Page 217</p> <p>1 A. He and Mike do Lindell-TV and FrankSpeech. 2 Q. And does Brannon Howse do any MyPillow 3 marketing? 4 A. He sells some MyPillow products with his 5 promo code, yes. 6 Q. And what are his promo codes? 7 A. WVV. 8 Q. Any other ones? 9 A. I don't recall the other ones that he uses on 10 Lindell-TV. 11 Q. Okay. And Mr. Howse does Lindell-TV with 12 Mike Lindell? 13 A. He -- yeah, and FrankSpeech. I don't know the 14 capacity which each one has. But I just know that they 15 are partners in that. 16 Q. The text from Mr. Lindell on February 5th also 17 references Mary. 18 Who's Mary? 19 A. I'm not sure who Mary is that he's talking 20 about here. 21 Q. Okay. I'm going to have you go back a couple 22 pages to page 14. On page 14, do you see that you've 23 texted Mr. Lindell on February 2nd with numbers for 24 different radio, podcasts, and influencers, and at the 25 bottom you mention WVV, the Worldwide View Weekend.</p>	<p style="text-align: right;">Page 219</p> <p>1 Q. And then you respond, "No, I have no contact 2 information for them." 3 Do you see that? 4 A. Yes. 5 Q. Okay. And then that \$63,797.86, would that 6 have been revenue from the year that was earned from the 7 sales of MyPillow products using the WVV code? 8 A. If I am speculating, I would imagine, but I 9 can't say for sure. 10 Q. Okay. Where would you have obtained that 11 information from, the \$63,000? 12 A. From a code usage report that I pull from 13 Annaware. 14 Q. Got it. Okay. 15 Then you would -- after Mr. Lindell says, 16 "Have they been paid?" You respond, "No, I have no 17 contact information." 18 Do you see that? 19 A. I do. 20 Q. He then responds and sends you contact 21 information. 22 Do you see that? 23 A. Yes. 24 Q. And the file name is, "Brannon Mary." 25 Do you see that?</p>
<p style="text-align: right;">Page 218</p> <p>1 A. Yes. 2 Q. And in that text at 1:44 p.m. you state, "I 3 figured out WVV. Worldwide View Weekend, \$6,300. Last 4 Monday, it's \$3,800. Do you have contact information for 5 them?" 6 Do you see that? 7 A. Yes. 8 Q. And that's Brandon [sic] Howse's code? 9 A. Brannon Howse. 10 Q. Brannon, I'm sorry. 11 And then, Mr. Lindell texts you back; correct? 12 A. Yes. 13 Q. And then, you text back to him -- well, let me 14 go back. 15 Mr. Lindell texted you back saying, "Yes, how 16 much have they done total?" 17 Do you see that? 18 A. Yes. 19 Q. You responded to him, "I went back until the 20 1st of the year, \$63,797.86." 21 Do you see that? 22 A. Yes. 23 Q. And he responds to you, "Have they been paid?" 24 Do you see that? 25 A. Yes.</p>	<p style="text-align: right;">Page 220</p> <p>1 A. I do. 2 Q. Do you know what that reference to Mary is? 3 A. I don't know who Mary is. 4 Q. Okay. Mr. Lindell says, "How much would their 5 check be?" 6 Do you see that? 7 A. Yes. 8 Q. He says, "their." 9 Do you know if there's another individual that 10 works with Brannon Howse? 11 A. Not to my knowledge, no. 12 Q. Okay. Then you continue to talk to him about 13 how much his check would be in this text. 14 Do you see that? 15 A. Yes. 16 Q. Okay. Now, if we go -- well, what is he being 17 paid for at the time? What was your understanding of what 18 Brannon would have been paid for? 19 A. I can't speculate what this text message 20 back-and-forth is from back then. 21 Q. Okay. 22 A. If I look back -- I don't know. 23 Q. Looking at the text exchange, at this time, 24 would you have any responsibilities for making this 25 payment to Brannon?</p>

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<p style="text-align: right;">Page 221</p> <p>1 A. If he is advertising MyPillow products using 2 promo code WVVW, yes. 3 Q. What would your responsibilities have been? 4 A. To pay him for his selling of MyPillow 5 merchandise. 6 Q. And in connection with that, would you have 7 created an invoice that identified the amounts of money to 8 be paid based on the promo code usage? 9 A. I don't know if an invoice was created or not. 10 I don't recall doing one, but I don't know. 11 Q. Okay. Would that type of information be kept 12 in any routine records of MyPillow? 13 A. I would imagine the controller has 14 information. 15 Q. Okay. Okay. Then if you go forward, skipping 16 back to page 18 or page 17 on February 5th -- now, 17 February 5th is the date of the Absolute Proof 18 documentary; correct? 19 A. Yes. 20 Q. Okay. And then, in that text that we looked 21 at from Mr. Lindell earlier at 7:07 a.m., he says, "Pay 22 Brannon by wire from now on." 23 Do you see that? 24 A. Yes. 25 Q. And you responded, "Okay, I will also get his</p>	<p style="text-align: right;">Page 223</p> <p>1 A. I don't know. 2 Q. Have you ever met Mary Fanning? 3 A. No. 4 Q. Have you ever had any communications with 5 Mary Fanning? 6 A. I've spoken to her on the phone once. 7 Q. Okay. What did you speak to her on the phone 8 about? 9 A. About Brannon. 10 Q. What about Brannon? 11 A. I don't know exactly. I cannot remember the 12 communication. 13 Q. Okay. When did you have the conversation with 14 Ms. Fanning? 15 A. Probably two years ago. 16 Q. Okay. Did you ever coordinate getting any 17 information from Mary Fanning to Mike Lindell? 18 A. No. 19 Q. Does -- does Mary Fanning have any promo codes 20 that she uses to sell MyPillow products? 21 A. Currently, no. 22 Q. Did she ever have any promo codes at any point 23 in time? 24 A. I don't know. I don't know if her and Brannon 25 shared a promo code. I don't know.</p>
<p style="text-align: right;">Page 222</p> <p>1 wire information." 2 Do you see that? 3 A. Yes. 4 Q. And at this time in February of 2021, did you 5 have any responsibilities for making any wire payments for 6 any radio, podcaster, or influencers? 7 A. I don't pay wires. I send an invoice for them 8 to be paid. 9 Q. Okay. And then who do you communicate the 10 wire information to? 11 A. Our controller. 12 Q. Okay. So you would have gotten the wire 13 information, given it to the MyPillow controller -- 14 A. Exactly. 15 Q. -- and then MyPillow would have paid it out? 16 A. Exactly. 17 Q. Got it. Okay. 18 And then you don't -- as you sit here, you 19 don't know what Mary is a reference to? 20 A. I'm not sure which Mary they're speaking of, 21 no. 22 Q. Okay. Are you familiar with a woman named 23 Mary Fanning? 24 A. The name sounds familiar, yes. 25 Q. Who is Mary Fanning?</p>	<p style="text-align: right;">Page 224</p> <p>1 Q. Okay. Would you be able to go into the 2 MyPillow records and identify whether Mary Fanning ever 3 had a promo code that she used separately from 4 Brannon Howse to sell MyPillow products? 5 A. I don't know where I could find that, no, 6 because it's not going to be documented on there as 7 Mary Fanning. 8 Q. Okay. Why wouldn't it be documented as 9 Mary Fanning? 10 A. Because I don't recall ever having a 11 promo code set up for Mary Fanning. 12 Q. Okay. Were there ever any promo codes set up 13 for the American Report? 14 A. Never heard of that. 15 Q. Okay. Did you ever help coordinate any 16 payments to Brannon Howse or Mary Fanning as compensation 17 for their work in being executive producers for the 18 Absolute Proof documentary? 19 A. No. 20 Q. Did you ever have any responsibilities to get 21 information to coordinate payment to anybody for any work 22 done on the Absolute Proof documentary? 23 A. No. 24 Q. Okay. So turning to page 18, kind of circling 25 back.</p>

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<p style="text-align: right;">Page 225</p> <p>1 In February of 2021, were you aware of whether</p> <p>2 any of the MyPillow radio, podcast, influencers were</p> <p>3 plugging or doing promotions of Mike Lindell's</p> <p>4 Absolute Proof documentary?</p> <p>5 A. As it states here, Gorka did three, and then</p> <p>6 we saw it on a previous exhibit that he plugged it three</p> <p>7 times.</p> <p>8 Q. Okay. So looking at page 18 of these texts</p> <p>9 between you and Mr. Lindell, you, on this page, had texted</p> <p>10 Mr. Lindell on, looks like, February 5th at 10:35 p.m.</p> <p>11 stating, "Gorka plugged the documentary three times during</p> <p>12 his show."</p> <p>13 Do you see that?</p> <p>14 A. I do.</p> <p>15 Q. Where would you have gotten that information</p> <p>16 from?</p> <p>17 A. We have saw it on a previous exhibit from</p> <p>18 Kathleen Bensi.</p> <p>19 Q. And then, you told Mike Lindell in this text?</p> <p>20 A. That's what I'm guessing.</p> <p>21 Q. Mr. Lindell responded saying, "Awesome."</p> <p>22 Do you see that?</p> <p>23 A. I do.</p> <p>24 Q. And then, you responded that same day to</p> <p>25 Mr. Lindell stating, "Scott Hennen is plugging like crazy</p>	<p style="text-align: right;">Page 227</p> <p>1 Beck, Charlie Kirk, Denish, The Chicks, WVW, Gorka,</p> <p>2 Ryan-Hope 45, RSBN, XStrats, David Harris, and Scott.</p> <p>3 Do you see that?</p> <p>4 A. Yes.</p> <p>5 Q. And Hannity is Sean Hannity?</p> <p>6 A. Yes.</p> <p>7 Q. Beck is Glenn Beck?</p> <p>8 A. Yes.</p> <p>9 Q. Who is Charlie Kirk?</p> <p>10 A. Another advertiser with Salem.</p> <p>11 Q. Dinesh or Dinesh?</p> <p>12 A. Dinesh D'Souza.</p> <p>13 Q. And was he a MyPillow advertiser?</p> <p>14 A. Also with Salem Media.</p> <p>15 Q. Do you know whether he was plugging the</p> <p>16 Absolute Proof documentary around this time?</p> <p>17 A. I'm not sure.</p> <p>18 Q. The Chicks?</p> <p>19 A. They're called Mock and Daisy, The Chicks,</p> <p>20 advertisers.</p> <p>21 Q. WVW, that's --</p> <p>22 A. Brannon Howse.</p> <p>23 Q. -- Brannon Howse. Gorka, that's</p> <p>24 Dr. Sebastian Gorka?</p> <p>25 A. Correct.</p>
<p style="text-align: right;">Page 226</p> <p>1 and has staff answering emails and taking calls on it."</p> <p>2 Do you see that?</p> <p>3 A. I see it.</p> <p>4 Q. Who is Scott Hennen?</p> <p>5 A. Scott Hennen has a radio show in North Dakota.</p> <p>6 Q. And was he a radio, podcast, influencer doing</p> <p>7 marketing for MyPillow?</p> <p>8 A. Yes.</p> <p>9 Q. Okay. Was he plugging in February of 2021 the</p> <p>10 Absolute Proof documentary?</p> <p>11 A. I don't recall, but it says here in a text</p> <p>12 that he was.</p> <p>13 Q. Okay. Where would you have gotten this</p> <p>14 information to text Mr. Lindell?</p> <p>15 A. I would imagine from Scott Henning [sic] --</p> <p>16 Hennen.</p> <p>17 Q. Okay. Okay. And then Mr. Lindell responds,</p> <p>18 "Awesome." If you look to the next page, 19.</p> <p>19 Do you see that?</p> <p>20 A. Yes.</p> <p>21 Q. And you sent him a text a few days later on</p> <p>22 February 8th, 2021.</p> <p>23 Do you see that?</p> <p>24 A. Yes.</p> <p>25 Q. And you've got numbers related to Hannity,</p>	<p style="text-align: right;">Page 228</p> <p>1 Q. And he had been plugging the Absolute Proof</p> <p>2 documentary; right?</p> <p>3 A. Yes.</p> <p>4 Q. And Ryan-Hope 45, who is that?</p> <p>5 A. Ryan Fournier, an influencer.</p> <p>6 Q. The next one is RSBN.</p> <p>7 Do you know if RSBN was plugging</p> <p>8 Absolute Proof documentary?</p> <p>9 A. I don't know. That was that Liz Willis. I</p> <p>10 don't know.</p> <p>11 Q. Liz Willis, okay.</p> <p>12 And they had a weekly number of over 400,000;</p> <p>13 correct?</p> <p>14 A. Correct.</p> <p>15 Q. XStrats-Pray45, what's that reference to?</p> <p>16 A. X Strategies is just another influencer, and</p> <p>17 that's their promo code.</p> <p>18 Q. Who is David Harris?</p> <p>19 A. Another advertiser.</p> <p>20 Q. And then Scott, who is --</p> <p>21 A. Scott Hennen.</p> <p>22 Q. Scott Hennen, okay.</p> <p>23 And that's the Scott Hennen we saw in the</p> <p>24 prior text --</p> <p>25 A. Yeah.</p>

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<p style="text-align: right;">Page 229</p> <p>1 Q. -- that was plugging --</p> <p>2 A. That's correct.</p> <p>3 Q. -- like crazy. Got it. Okay. Got it.</p> <p>4 At the bottom on this same page -- and I'm</p> <p>5 on 19 -- it mentions in a text that you sent at 3:36,</p> <p>6 "Promo code FLASH has brought in 1.6 million in sales.</p> <p>7 Does anyone get credit for that?"</p> <p>8 What is the promo code FLASH associated with?</p> <p>9 A. Flash Point.</p> <p>10 Q. What is Flash Point?</p> <p>11 A. I don't know. I didn't set it. I don't know.</p> <p>12 Q. Is that flash associated with any --</p> <p>13 A. Nobody that I work with, no.</p> <p>14 Q. Got it. Okay. Okay.</p> <p>15 Let's go to page 32 of these texts, and I'm</p> <p>16 looking at an email on -- or text, I'm sorry, on February</p> <p>17 16th, 2021. Just let me know if you're there.</p> <p>18 A. Yes.</p> <p>19 Q. You sent Mr. Lindell a text at 3:20 that</p> <p>20 listed a number of your radio, podcast, or influencers</p> <p>21 with a number.</p> <p>22 Do you see that?</p> <p>23 A. Yes.</p> <p>24 Q. Those listed are Hannity, Beck, David Harris,</p> <p>25 Gorka, Gallagher, Metaxas, Ryan-Hope 45, RSBN,</p>	<p style="text-align: right;">Page 231</p> <p>1 Q. Would Mr. Hannity's people have received this</p> <p>2 press release that's attached to the email in 429?</p> <p>3 A. I can't say for sure. I don't know.</p> <p>4 Q. Okay. Okay. I'm going to have you put that</p> <p>5 aside, but I might go back to these texts at some point in</p> <p>6 time, and I'm going to mark and show you another exhibit.</p> <p>7 This one relates to Pete Santilli.</p> <p>8 Do you know who Pete Santilli is?</p> <p>9 A. I do.</p> <p>10 Q. Who is he?</p> <p>11 A. One of my advertisers.</p> <p>12 Q. Was he an advertiser in 2021?</p> <p>13 A. I don't know when he came on board.</p> <p>14 Q. Okay.</p> <p>15 (Whereupon, Exhibit 438 was marked.)</p> <p>16 BY MS. WRIGLEY:</p> <p>17 Q. Handing to you what's been marked as</p> <p>18 Exhibit 438. For the record, there's a cover sheet on</p> <p>19 this exhibit, it's Exhibit 17. It was marked as an</p> <p>20 exhibit to the Supplemental Complaint filed in this case,</p> <p>21 and this exhibit represents a number of screenshots that</p> <p>22 are -- were taken from a podcast on the Pete Santilli Show</p> <p>23 from February 24th, 2021 where Mr. Lindell made an</p> <p>24 appearance. In the interest of time, we're going to look</p> <p>25 at some screenshots as opposed to watch the video.</p>
<p style="text-align: right;">Page 230</p> <p>1 XStrats-Pray45, Dinesh; is that right?</p> <p>2 A. Dinesh.</p> <p>3 Q. Dinesh, thank you.</p> <p>4 You also sent a text at 3:31 p.m. stating,</p> <p>5 "Linda, Hannity's producer, is asking for a press release</p> <p>6 for the retailers dropping us."</p> <p>7 Do you see that?</p> <p>8 A. Yes.</p> <p>9 Q. And then, there's a response from</p> <p>10 Mike Lindell.</p> <p>11 Do you see that?</p> <p>12 A. Yes.</p> <p>13 Q. He says, "What do you mean?"</p> <p>14 And then, you responded, "She's just wondering</p> <p>15 if we had a statement about it."</p> <p>16 Do you see that?</p> <p>17 A. Yes.</p> <p>18 Q. Okay. And would that have been the</p> <p>19 press release that you -- that we saw earlier from the</p> <p>20 same date regarding Absolute Proof?</p> <p>21 A. I don't know for sure. I don't know.</p> <p>22 Q. So if we go back to -- I might have you look</p> <p>23 at a previous exhibit. 429.</p> <p>24 Do you see 429?</p> <p>25 A. I do.</p>	<p style="text-align: right;">Page 232</p> <p>1 Each of these screenshots -- and they go from</p> <p>2 A, B, C, D, F -- at the bottom, it will tell you the point</p> <p>3 in time during that podcast where this screenshot was</p> <p>4 taken.</p> <p>5 Just look through those, and then, I just want</p> <p>6 to ask you whether you're familiar with this appearance by</p> <p>7 Mr. Lindell on the Pete Santilli Show around this time,</p> <p>8 February 24th, 2021?</p> <p>9 A. I'm not familiar with it, no.</p> <p>10 Q. Okay. In February of 2021, would you have</p> <p>11 been aware of an appearance by Mike Lindell on the</p> <p>12 Pete Santilli Show to discuss election fraud?</p> <p>13 A. Not to my knowledge, no.</p> <p>14 Q. Would you have discussed any appearance that</p> <p>15 Mr. Lindell made on the Pete Santilli Show before he went</p> <p>16 on?</p> <p>17 A. Not that I remember, no.</p> <p>18 Q. Okay. At this time, was Mr. Santilli an ad --</p> <p>19 sort of an advertiser -- one of your advertisers for</p> <p>20 MyPillow marketing?</p> <p>21 A. Like I stated, I don't know when he came</p> <p>22 aboard.</p> <p>23 Q. Okay. Would he have been using -- if he was</p> <p>24 on board, would he have been using a promo code to help</p> <p>25 sell MyPillow products?</p>

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<p style="text-align: right;">Page 233</p> <p>1 A. He does now. Like I said, I don't know when 2 he started. 3 Q. What is Mr. Santilli's code? 4 A. PETE. 5 Q. PETE, okay. 6 If Mr. Santilli told his audience about a 7 MyPillow promo code on this day in connection with 8 Mr. Lindell's appearance, would there be records of how 9 many times it was used? 10 A. If he was advertising MyPillow products and 11 used promo code PETE, I would be able to track the sales. 12 Q. Okay. And actually, you can put that to the 13 side. I lied. We're going to watch a little bit of the 14 video -- just a little bit of the video from Mr. Lindell's 15 appearance that day on the Pete Santilli Show. 16 My colleague's going to go around and play 17 that for you. This is -- this video is actually the full 18 video of the podcast show. It's going to be marked as 19 Exhibit 439. 20 (Whereupon, Exhibit 439 was marked.) 21 BY MS. WRIGLEY: 22 Q. It's over 30 minutes, so we're not going to 23 watch the full show. We're going to watch a portion of 24 it, and we're kind of going to go in almost to the end, 25 and my colleague is going to start playing it at the</p>	<p style="text-align: right;">Page 235</p> <p>1 and the Nile River. It's ultra soft and breathable but 2 extremely durable. My Giza sheets also include full 3 21-inch-wide pillowcases that will fit over any pillow, 4 and deep-pocket sheets that will fit over any mattress. 5 The first night you sleep on my sheets, you'll never want 6 to sleep on anything else. 7 VOICE: Go to mypillow.com or call the number 8 on your screen right now to get your very own MyPillow 9 Giza Dream sheets. Giza Dream sheets are available in a 10 variety of colors. Use the promo code, and I could give 11 you two for one low price and free shipping. That's 12 right, get two for one low price plus free shipping (song 13 playing). (Video stopped.) 14 BY MS. WRIGLEY: 15 Q. Are you familiar with that, like, promo or 16 advertisement from the Pete Santilli Show? 17 A. Yes. 18 Q. Okay. And would you have been aware of that 19 at the time in February of 2021? 20 A. We take promo codes for specific advertisers 21 when they're promoting products, yes. 22 Q. Okay. And you would have done that in 23 connection with your job at MyPillow? 24 A. I don't do it personally. The Dove Company 25 does.</p>
<p style="text-align: right;">Page 234</p> <p>1 30 minute, 45 second mark, and then, we will watch it to 2 the end. 3 THE REPORTER: The what mark? 4 MS. WRIGLEY: 30:45, 30 minutes, 5 45 second mark. 6 (Video Played: 7 MIKE LINDELL: "Thank you all. God Bless you. 8 PETE SANTILLI: Thank you. God Bless you, 9 too. Stay strong, Mike. Thank you very much for taking 10 the time out, I really appreciate it. All right? Thank 11 you. 12 All right, you guys. I've been telling you 13 that this is that moment in time where it's not just 14 calling upon Mike Lindell to do all the work on our 15 behalf. This is that moment in time in our nation's 16 history where each and every one of us can do our part to 17 expose the truth. You should be invigorated and 18 energized, and you heard it right here on the 19 Pete Santilli Show. He's going on the offensive. 20 MIKE LINDELL: Hello, I'm Mike Lindell, and as 21 you know, my passion is to help each and every one of you 22 get the best sleep of your life. That's why I created my 23 new Giza Dreams bed sheets. I started by using the 24 world's best cotton called Giza. It's only grown in a 25 region between the Sahara Desert, the Mediterranean Sea,</p>	<p style="text-align: right;">Page 236</p> <p>1 Q. What's the Dove Company? 2 A. The guy that just puts in the promo code. 3 Q. I see. I see. Okay. Okay. 4 And watching that video, did you see the 5 reference to -- or the visual of a promo code used to sell 6 the MyPillow Giza sheets? 7 A. Yes. 8 Q. And the promo code was PETE; correct? 9 A. Correct. 10 Q. I'm going to mark another exhibit and hand it 11 to you. 12 (Whereupon, Exhibit 440 was marked.) 13 BY MS. WRIGLEY: 14 Q. Ms. Curtis, I'm going to hand you what's been 15 marked as Exhibit 440. 16 Does this appear to be sort of a screenshot of 17 what appeared on part of that video that we saw from the 18 Pete Santilli Show in connection with the advertisement 19 for the Giza sheets? 20 A. Yes. 21 Q. And it shows the promo code PETE? 22 A. Correct. 23 Q. Okay. And this promo code would have gone 24 into the MyPillow system for tracking? 25 A. Correct.</p>

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<p style="text-align: right;">Page 237</p> <p>1 Q. Okay. And then, to this day, does 2 Mr. Santilli still use the code PETE? 3 A. Yes. 4 Q. Okay. And then, I'm going to have you turn 5 back to those texts. You can put that to the side. And 6 it's the texts with the Bates Number 034384 marked as 7 Exhibit 437. 8 And just like the previous text chain that we 9 saw, these texts from, sort of, January through July of 10 2021 include texts between you and Mr. Lindell on almost a 11 daily basis with sort of top performance of promo codes; 12 correct? 13 A. Yes. 14 Q. And that's for the radio, the influencers, and 15 the podcasters; right? 16 A. Correct. 17 Q. And then I want to go to page 39. Page 39 has 18 some texts from you to Mr. Lindell, and this is from 19 February 24th, 2021, which is the date from the video 20 where Mr. Lindell appears on the Pete Santilli Show. 21 Do you see that you sent him a text on 22 February 24th, 2021 at 1:45 p.m. 23 Do you see that? 24 A. Yes. 25 Q. And at the very top, you list Pete Santilli,</p>	<p style="text-align: right;">Page 239</p> <p>1 And then, if I look at a text from the next 2 day, sort of, there's a number of advertisers listed here; 3 correct? 4 A. Correct. 5 Q. This is February 25th, 2021. Pete Santilli is 6 mentioned in that list as well; correct? 7 A. Correct. 8 Q. And he's middle down, it has, "\$3,400. Last 9 Wednesday, \$1,500." 10 Do you see that? 11 A. Yes. 12 Q. What does that \$3,400 represent? 13 A. The same as all the others; the amount of 14 sales he did. 15 Q. Okay. And that would have been sales for the 16 day? 17 A. That's correct. 18 Q. And the one above that from 2/24, that 19 \$11,400, that was sales from the day? 20 A. Correct. 21 Q. Okay. Then, if you go down -- or to the next 22 page, page 40 which is a text on February 26th, 2021, do 23 you see that in your report to Mr. Lindell, Pete Santilli 24 is listed again? 25 A. Yes.</p>
<p style="text-align: right;">Page 238</p> <p>1 and you've got \$11,400. 2 Do you see that part? 3 A. Yes. 4 Q. And you also state, "Last Tuesday, \$1,100. He 5 sent me your interview." 6 Do you see that? 7 A. Yes. 8 Q. And does this look like as of this date, 9 Pete Santilli had a MyPillow promotional code to help sell 10 MyPillow products? 11 A. It looks like it. 12 Q. Okay. And then, this "He sent me your 13 interview," would that have been the interview that we saw 14 in the video that we played from Exhibit 349 [sic]? 15 A. I don't remember two years back what the 16 interview was. 17 Q. Okay. Do you have an understanding of why 18 Mr. Santilli might have sent an interview to you from 19 Mike Lindell that he included? 20 A. Because sometimes when there's an audio of the 21 interview, they'll send the interview to Mike. 22 Q. Got it. 23 And then, what does that \$11,400 represent? 24 A. The sales that came in with this promo code. 25 Q. Got it.</p>	<p style="text-align: right;">Page 240</p> <p>1 Q. He's got sales of \$4,300 for the day; correct? 2 A. Correct. 3 Q. And would those have been sales tracked with 4 the use of the PETE promo code? 5 A. Correct. 6 Q. Okay. All right. One second. 7 MS. WRIGLEY: Okay. So I'm done with 8 that for now. We're going to take a quick break because 9 the videographer has to change the tape. 10 THE VIDEOGRAPHER: We are going off the 11 record. The time now is 2:20 p.m. This concludes Media 12 Unit Number 3. 13 (Whereupon, a recess was taken from 14 2:20 p.m. to 2:33 p.m.) 15 THE VIDEOGRAPHER: We are going back on 16 the record. The time now is 2:33 p.m. This is the 17 beginning of Media Unit 4. 18 BY MS. WRIGLEY: 19 Q. Ms. Curtis, I'm going to show you another 20 video tape from an appearance that -- another appearance 21 Mr. Lindell made on a media show about Absolute Proof. 22 This is an appearance on Steve Bannon's War Room from 23 March 26th, 2021. It's marked as 441, and once again, my 24 colleague is going to play a few minutes of it, not the 25 whole thing. She's going to play from the beginning until</p>

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<p style="text-align: right;">Page 241</p> <p>1 approximately 1 minute, 45 seconds. 2 (Whereupon, Exhibit 441 was marked.) 3 (Video Played: 4 STEVE BANNON: "I want to go back to 5 Mike Lindell. 6 So Mike, I just want to put into perspective 7 for our audience. You made this film, Absolute Proof, 8 came out in February, caused a huge -- you know, huge 9 blowup. The media, who was all excited about every one of 10 your moves, every one of your steps. Total crickets; 11 right? All of a sudden, you stopped seeing any articles 12 about this. 13 You and Dominion finally got into this legal 14 situation, right, where they sued you. You've now come 15 out, and instead of either backing down or working out 16 some deal with Dominion or working out some compromise or 17 saying you're sorry, you've now tripled down. You've made 18 another film called Absolute Interference. 19 For our audience, when are you -- when are you 20 going to release this next movie Absolute Interference? 21 MIKE LINDELL: Well, the one part, the one 22 guest was so good that I made an hour show just about him. 23 We're going to release that later in the week. You can 24 see that on lindell-tv.com. Then -- and then, the 25 following week, we'll release out Absolute Interference,</p>	<p style="text-align: right;">Page 243</p> <p>1 Q. And in the appearance or the video, 2 Mr. Lindell mentioned wanting to release 3 Absolute Interference in connection with his social media 4 platform Frank. 5 Did you remember hearing that? 6 A. I know of social media, yeah, Frank. 7 Q. Are you familiar with Frank? 8 A. Somewhat, yes. 9 Q. What is Frank? 10 A. FrankSpeech. 11 Q. Were you aware at the time, in March of 2021, 12 whether Mr. Lindell was appearing on various media outlets 13 to promote or discuss his Absolute Proof series related to 14 election fraud? 15 A. I don't recall that. 16 Q. Do you know if any media outlets were running 17 advertisements at the same time for MyPillow products? 18 A. I don't recall that, either. 19 Q. Do you know whether Mr. Lindell was using his 20 appearance to help sell MyPillow products at the time? 21 A. I don't recall that, either. 22 Q. Around this time, in March of 2021, would 23 Steve Bannon of War Room been promoting or using any 24 promotional codes to help sell MyPillow products? 25 A. Once again, I don't know when War Room</p>
<p style="text-align: right;">Page 242</p> <p>1 and that -- that could be later in the week. We haven't 2 set the exact date on that yet. I kind of want to line 3 that up with my launching my new social media platform 4 which will be Frank. 5 But this -- when you watch this -- and all of 6 you have seen Absolute Proof -- you know, we're just going 7 to keep dropping more and more. It's going to be to the 8 point that the only announcement I'll be able to make is, 9 'Hey, if you work for Dominion and you were part of this 10 crime against humanity, turn yourself in, save yourselves 11 some jail time.' That's all I can say. I mean, I don't 12 know what else to say to these people. 13 STEVE BANNON: Just to make sure we're as 14 specific as possible, in this film Absolute Interference, 15 are you saying you have whistleblower --" (Video stopped.) 16 BY MS. WRIGLEY: 17 Q. Ms. Curtis, had you seen this video or 18 appearance by Mr. Lindell on Steve Bannon's War Room 19 podcast? 20 A. No. 21 Q. Would you have been aware of his appearance in 22 March of 2021? 23 A. No. 24 Q. Are you familiar with Absolute Interference? 25 A. I know it's another video he did.</p>	<p style="text-align: right;">Page 244</p> <p>1 started. 2 Q. Okay. Let's go to back to Exhibit 437, which 3 is one of your texts. I'm going to ask you to turn to 4 page 57. 5 Are you there? 6 A. I am. 7 Q. The text on these pages are on the date 8 March 26th, 2021, which I'll represent was the date of the 9 appearance and the video we just saw from Mr. Lindell 10 being on Steve Bannon's War Room. 11 Do you see that you text Mr. Lindell on that 12 date at 12:09 p.m.? 13 A. I do see that, yes. 14 Q. And the first text that you list -- or the 15 first, sort of, advertiser that you list there is War Room 16 with \$69,200. 17 Do you see that? 18 A. I do. 19 Q. What does that \$69,200 represent? 20 A. The sales brought in using promo code WARROOM. 21 Q. Okay. And if you look, I guess, to the 22 page before on March 25th, do you see that there were also 23 sales for War Room on the prior day? 24 A. Yes. 25 Q. Okay. And then, actually, if you go to the</p>

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<p style="text-align: right;">Page 245</p> <p>1 next page, page 58, you text a report of sales for the</p> <p>2 promo codes used by these entities on March 29th, and</p> <p>3 War Room's listed there as well; correct?</p> <p>4 A. Correct.</p> <p>5 Q. And on March 29th, 2001, the amount for</p> <p>6 War Room is \$536,800.</p> <p>7 Do you see that?</p> <p>8 A. I do, yes.</p> <p>9 Q. You also note, "Week prior, \$316 -- \$316,100."</p> <p>10 Do you see that?</p> <p>11 A. Yes.</p> <p>12 Q. And what does that \$536,800 represent?</p> <p>13 A. A week of sales.</p> <p>14 Q. And then, for a week of sales of MyPillow</p> <p>15 products on -- for War Room?</p> <p>16 A. Yes.</p> <p>17 Q. And then, if you look at page 59, do you see,</p> <p>18 on March 30th, in your report, War Room's, again, at the</p> <p>19 top with 31 -- a little over \$31,000?</p> <p>20 A. Yes.</p> <p>21 Q. And that's the daily sales?</p> <p>22 A. Yes.</p> <p>23 Q. And then, if you look at your report in the</p> <p>24 text from March 31st, 2021, there's a daily sales of --</p> <p>25 for War Room, \$28,300.</p>	<p style="text-align: right;">Page 247</p> <p>1 the Absolute Proof series on War Room?</p> <p>2 A. I have no idea.</p> <p>3 Q. Okay. And then, do you know whether those</p> <p>4 were sort of typical numbers, either on a weekly or a</p> <p>5 daily basis, in terms of MyPillow sales for Steve Bannon's</p> <p>6 War Room?</p> <p>7 A. Whenever Mike is on promoting MyPillow</p> <p>8 products, those -- yes.</p> <p>9 Q. Okay. And is the same thing true for some of</p> <p>10 the other radio, media, influencers when Mike Lindell</p> <p>11 appears, do sales typically increase?</p> <p>12 A. Because he's talking about the MyPillow</p> <p>13 products, they tend to have a larger spot run rather than</p> <p>14 their 60-second spot.</p> <p>15 Q. And what about when he's on talking about his</p> <p>16 Absolute Proof election fraud documentaries?</p> <p>17 A. I don't see a spike in sales at all.</p> <p>18 Q. Okay. What about for this one that was on</p> <p>19 March 26th, 2021 on War Room?</p> <p>20 A. I don't know. I'd have to look back at text</p> <p>21 messages and look at the numbers.</p> <p>22 Q. Okay. I want to show you another video. This</p> <p>23 one is from the Eric Metaxas Radio Show. This is going to</p> <p>24 be marked Exhibit 442. The video is over 40 minutes long,</p> <p>25 and again, my colleague's going to put the video in. This</p>
<p style="text-align: right;">Page 246</p> <p>1 Do you see that?</p> <p>2 A. I do.</p> <p>3 Q. And then, if you go to page 60, do you see</p> <p>4 there's a text from you to Mr. Lindell on April 1st, 2021,</p> <p>5 and again, War Room is at the top?</p> <p>6 A. Yes.</p> <p>7 Q. War Room is \$34,700.</p> <p>8 Do you see that?</p> <p>9 A. Yes.</p> <p>10 Q. And on these few days from March 26th through</p> <p>11 April 1st, War Room is at the top of the amount of radio,</p> <p>12 podcast, influencers selling MyPillow products; correct?</p> <p>13 A. He is.</p> <p>14 Q. And then, if you go to page 62, you report</p> <p>15 additional numbers, and War Room is at the top for</p> <p>16 March -- strike that, for April 2nd, 2021 with daily sales</p> <p>17 of \$33,400.</p> <p>18 Do you see that?</p> <p>19 A. Yes.</p> <p>20 Q. And then, when you go down to the next text on</p> <p>21 that same page, page 62 for April 5th, 2021, War Room's</p> <p>22 got over \$200,000 sales for the week; correct?</p> <p>23 A. Correct.</p> <p>24 Q. Okay. And do you know around this time</p> <p>25 whether either Mike Lindell or Steve Bannon was promoting</p>	<p style="text-align: right;">Page 248</p> <p>1 is from April 30th, 2021, just a few days after the one we</p> <p>2 saw from Mr. Bannon. It's got an appearance by</p> <p>3 Mike Lindell, and she's going to play from the start until</p> <p>4 about the 2-minute mark.</p> <p>5 MS. OLIVER: I believe that says</p> <p>6 March 30th.</p> <p>7 MS. WRIGLEY: Oh, March 30th. Thank</p> <p>8 you.</p> <p>9 (Whereupon, Exhibit 442 was marked.)</p> <p>10 (Video Played:</p> <p>11 ERIC METAXAS: "Folks, welcome back. I have</p> <p>12 our friend Mike Lindell of mypillow.com, famed of</p> <p>13 mystore.com. Famed. Here he is.</p> <p>14 Mike, you look like you're in an airport</p> <p>15 closet.</p> <p>16 MIKE LINDELL: I am.</p> <p>17 ERIC METAXAS: I only know that because you</p> <p>18 told me.</p> <p>19 Listen, you're all over the place. You're</p> <p>20 doing tremendous things. We're going to talk to you about</p> <p>21 everything, but what's the most important thing right now?</p> <p>22 What is happening in your life?</p> <p>23 MIKE LINDELL: Well, right now we just</p> <p>24 finished -- there's three things. They're all -- they're</p> <p>25 all equally important. The first one is we're coming out</p>

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<p style="text-align: right;">Page 249</p> <p>1 with a documentary at noon on Wednesday. It's a one-hour</p> <p>2 of a new cyber guy, a new -- actually, he's a scientist,</p> <p>3 and he was so good in my new show, Absolute Interference,</p> <p>4 that we made a separate one of him coming out at noon on</p> <p>5 Wednesday. Everyone -- it needs to be seen by millions.</p> <p>6 ERIC METAXAS: Wait, wait, wait, wait.</p> <p>7 Tomorrow Wednesday? Tomorrow?</p> <p>8 MIKE LINDELL: That's correct.</p> <p>9 ERIC METAXAS: Where can they see it?</p> <p>10 MIKE LINDELL: Tomorrow. Lindell-tv.com.</p> <p>11 Lindell-tv.com. And we're going to share it with everyone</p> <p>12 in the world, the links and the -- it's amazing because</p> <p>13 even in your own towns, you can now check out and see what</p> <p>14 really happened in your election. It's a beautiful thing.</p> <p>15 We can see what the machines did.</p> <p>16 ERIC METAXAS: Lindell-tv.com.</p> <p>17 Now, do people need to use the code ERIC to</p> <p>18 get a big discount?</p> <p>19 MIKE LINDELL: Well, you know, they could use</p> <p>20 that at mypillow.com and mystore.com.</p> <p>21 ERIC METAXAS: Oh, oh.</p> <p>22 MIKE LINDELL: Don't confuse it here, we got</p> <p>23 to keep everything lined up.</p> <p>24 ERIC METAXAS: Okay. So we're talking about</p> <p>25 lindell-tv.com. So this is free. It wouldn't hurt to use</p>	<p style="text-align: right;">Page 251</p> <p>1 sold MyPillow products with that code; correct?</p> <p>2 A. He's been selling for years, yes.</p> <p>3 Q. Okay. I want to have you go back to the text</p> <p>4 chain and go to page 59, and this is Exhibit 437. It's a</p> <p>5 few pages after when we were looking at it for War Room,</p> <p>6 and I'm going to have you look at the text on March 30th</p> <p>7 that you sent Mr. Lindell, kind of, with the list of</p> <p>8 entities and the numbers, at 12:40 p.m.</p> <p>9 Do you see that?</p> <p>10 A. Yes.</p> <p>11 Q. Okay. And then, Eric Metaxas isn't mentioned</p> <p>12 in this list; correct?</p> <p>13 A. That's correct.</p> <p>14 Q. If you go down to the next day, March 31st,</p> <p>15 2021, do you see that he appears on the list?</p> <p>16 A. Yes.</p> <p>17 Q. And second-to-the-last entity listed here, is</p> <p>18 "Metaxas, \$3,800."</p> <p>19 Do you see that?</p> <p>20 A. Yes.</p> <p>21 Q. What does that \$3,800 represent?</p> <p>22 A. The sales that came in using his promo</p> <p>23 code.</p> <p>24 Q. Okay. And that would have been promo code</p> <p>25 ERIC?</p>
<p style="text-align: right;">Page 250</p> <p>1 the code ERIC because maybe you get cash back. But here's</p> <p>2 the issue --</p> <p>3 MIKE LINDELL: Well, you know -- yeah, you can</p> <p>4 get a free DVD there.</p> <p>5 ERIC METAXAS: Okay. Let me -- let me ask</p> <p>6 you, Mike, because we're -- we love to joke, we're happy,</p> <p>7 but here's my question." (Video stopped.)</p> <p>8 BY MS. WRIGLEY:</p> <p>9 Q. At this time, would you have been aware of</p> <p>10 Mr. Lindell's appearance on Eric Metaxas's Radio Show?</p> <p>11 A. I don't know. He's done several appearances.</p> <p>12 I don't know particular dates or times.</p> <p>13 Q. Would you have helped coordinate his</p> <p>14 appearance on the show?</p> <p>15 A. I've done some. I can't say I did them all.</p> <p>16 Q. Do you know if you did this one?</p> <p>17 A. I don't recall doing this one at all.</p> <p>18 Q. Okay. During the segment that we watched from</p> <p>19 that show, they -- Mr. Metaxas referenced use of a</p> <p>20 promo code for MyPillow products; correct?</p> <p>21 A. Correct.</p> <p>22 Q. And is that his code ERIC?</p> <p>23 A. That's correct.</p> <p>24 Q. And Mr. Metaxas regularly, before this and</p> <p>25 after this -- this being in March of 2021 -- promoted and</p>	<p style="text-align: right;">Page 252</p> <p>1 A. That's correct.</p> <p>2 Q. And this would have been the day after</p> <p>3 Mr. Lindell's appearance on the segment that we just</p> <p>4 looked at for the Eric Metaxas?</p> <p>5 A. And it was brought to Mike's attention because</p> <p>6 it was half the sales from the week prior.</p> <p>7 Q. Got it. Less?</p> <p>8 A. It was a deviation. Correct.</p> <p>9 Q. Yes, sold less than he did the week prior?</p> <p>10 A. Correct.</p> <p>11 Q. Got it. Okay.</p> <p>12 At this time, did you have -- in March of</p> <p>13 2021, which is about one to two months after</p> <p>14 Absolute Proof comes out, did you have an understanding in</p> <p>15 your position as marketing director at MyPillow of whether</p> <p>16 Mr. Lindell's media appearances were focused on discussing</p> <p>17 election fraud?</p> <p>18 MS. OLIVER: Objection to form.</p> <p>19 You can answer.</p> <p>20 A. I don't recall.</p> <p>21 BY MS. WRIGLEY:</p> <p>22 Q. Would you have been regularly apprised of the</p> <p>23 various appearances that he was making, at least in terms</p> <p>24 of radio, podcast, and influencers?</p> <p>25 A. I set up very few radio interviews. I don't</p>

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<p style="text-align: right;">Page 253</p> <p>1 know what he was doing on other platforms.</p> <p>2 Q. Are you aware that Absolute -- after</p> <p>3 Absolute Proof, Mr. Lindell created and published a second</p> <p>4 documentary called Scientific Proof?</p> <p>5 A. I've heard of it, yes.</p> <p>6 Q. I'm going to have you go back to I think what</p> <p>7 we had -- it was a previously-marked exhibit, 47. I don't</p> <p>8 know where it's at in your stack.</p> <p>9 A. 47.</p> <p>10 Q. It's actually probably between 411 and 412.</p> <p>11 Do you have it in front of you?</p> <p>12 A. Yeah, I do.</p> <p>13 Q. Looking at what was previously marked</p> <p>14 Exhibit 47, this was an email between you and -- from K.G.</p> <p>15 to you on March 31st, 2021.</p> <p>16 Do you see that?</p> <p>17 A. Yes.</p> <p>18 Q. And the subject was, "Press Release" with an</p> <p>19 attachment, "Scientific Proof's Press Release."</p> <p>20 Do you see that?</p> <p>21 A. Yes.</p> <p>22 Q. And if I go to the attachment, do you see that</p> <p>23 it's got this title, "Mike Lindell-TV Releases Irrefutable</p> <p>24 Election Theft Proof on New Television Special That</p> <p>25 Features World Renowned Physicist"?</p>	<p style="text-align: right;">Page 255</p> <p>1 A. I have no idea.</p> <p>2 Q. Okay. In March of 2021, did you have any</p> <p>3 discussions with Mr. Lindell about the release of</p> <p>4 Scientific Proof?</p> <p>5 A. I don't know.</p> <p>6 Q. Did Mr. Lindell ask you to send it to any of</p> <p>7 the MyPillow advertisers?</p> <p>8 A. I don't know.</p> <p>9 Q. Okay.</p> <p>10 (Whereupon, Exhibit 443 was marked.)</p> <p>11 BY MS. WRIGLEY:</p> <p>12 Q. I'm going to hand to you what's been marked as</p> <p>13 Exhibit 443. The Bates Number is DEF013307. It's got an</p> <p>14 attachment, which is 14308.</p> <p>15 Do you see that this is an email from you to</p> <p>16 Steve Doubles on March 31st, 2021 with a forward --</p> <p>17 subject line, "Forward press release"?</p> <p>18 A. Yes.</p> <p>19 Q. And the attachment is the press release for</p> <p>20 Scientific Proof, similar to what we just looked at from</p> <p>21 Exhibit 47; correct?</p> <p>22 A. Yes.</p> <p>23 Q. And if you look at the first email on this --</p> <p>24 on the first page, it has that email from Katelyn Gamlin</p> <p>25 to you with the press release.</p>
<p style="text-align: right;">Page 254</p> <p>1 A. Yes.</p> <p>2 Q. And then, the press release starts off,</p> <p>3 "On March 31st, Mike Lindell, the CEO of MyPillow,</p> <p>4 released a one-hour television special entitled,</p> <p>5 'Scientific Proof: Internationally Renowned Physicist</p> <p>6 Absolutely Proves 2020 Election Was Biggest Cyber-Crime in</p> <p>7 World History'."</p> <p>8 Do you see that?</p> <p>9 A. Yes.</p> <p>10 Q. And then it -- it sort of continues.</p> <p>11 At the time this came out, did you attend or</p> <p>12 watch the Scientific Proof movie?</p> <p>13 A. No.</p> <p>14 Q. Okay. Are you familiar with it?</p> <p>15 A. No.</p> <p>16 Q. Have you ever watched it?</p> <p>17 A. Not in its entirety.</p> <p>18 Q. Have you watched portions of it?</p> <p>19 A. Maybe 2 minutes.</p> <p>20 Q. Were you, at the time, aware it was being</p> <p>21 released at the end of March of 2021?</p> <p>22 A. I'm aware it was released, yes.</p> <p>23 Q. Okay. And did you take any steps to send</p> <p>24 Scientific Proof out to any advertisers, radio, podcaster,</p> <p>25 influencers at the time?</p>	<p style="text-align: right;">Page 256</p> <p>1 Do you see that?</p> <p>2 A. I do.</p> <p>3 Q. And then you forwarded it to Steve Doubles,</p> <p>4 the press release for Scientific Proof at iheartmedia.com;</p> <p>5 correct?</p> <p>6 A. Yes.</p> <p>7 Q. Who is Steve Doubles?</p> <p>8 A. A rep for iHeart Media.</p> <p>9 Q. Okay. Why did you send a press release to</p> <p>10 him?</p> <p>11 A. Because I was asked to.</p> <p>12 Q. Who asked you to do that?</p> <p>13 A. Mike Lindell.</p> <p>14 Q. And did you send the Scientific Proof</p> <p>15 press release to Mr. Doubles at iHeart Media as part of</p> <p>16 your job at MyPillow?</p> <p>17 A. At per Mike Lindell's request.</p> <p>18 Q. Okay. You sent it from your MyPillow email</p> <p>19 account; correct?</p> <p>20 A. That's correct.</p> <p>21 Q. And you sent it in an email that had your</p> <p>22 title; correct?</p> <p>23 A. That's correct.</p> <p>24 Q. And when you sent this, you were on the job or</p> <p>25 working during the hours in your position at MyPillow;</p>

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<p style="text-align: right;">Page 257</p> <p>1 correct?</p> <p>2 A. I'm salary. I'm always on the job.</p> <p>3 Q. Got it.</p> <p>4 In addition to -- let me back up.</p> <p>5 iHeart Media, what radio shows or podcasts are associated</p> <p>6 with iHeart Media in terms of advertisers?</p> <p>7 A. There's hundreds.</p> <p>8 Q. Hundreds?</p> <p>9 A. Sean Hannity, Glenn Beck, WOR, the Boston</p> <p>10 stations. There's many.</p> <p>11 Q. Got it.</p> <p>12 Would you have sent the press release for</p> <p>13 Scientific Proof to anybody at the Salem Media Group?</p> <p>14 A. It's possible. I don't remember.</p> <p>15 Q. Would you have sent it to CSC Talk Radio?</p> <p>16 A. I don't recall.</p> <p>17 Q. Would you have sent it to RSBN?</p> <p>18 A. I don't recall.</p> <p>19 Q. Would there be any reason that you would have</p> <p>20 sent this to Steve Bubbles at -- Doubles at iHeart Media</p> <p>21 but not some of the other media entities you worked with</p> <p>22 for --</p> <p>23 A. I don't recall that, either.</p> <p>24 Q. Okay.</p> <p>25 (Whereupon, Exhibit 445 was marked.)</p>	<p style="text-align: right;">Page 259</p> <p>1 documentary," and then you have a -- sort of, a link that</p> <p>2 says, "Lindell-tv.com/Mike Lindell-TV releases irrefutable</p> <p>3 election theft proof."</p> <p>4 Do you see that?</p> <p>5 A. I do.</p> <p>6 Q. And then Mr. Blatterfein responds the same</p> <p>7 day.</p> <p>8 Do you see that?</p> <p>9 A. Yes.</p> <p>10 Q. He states, "Got it. Thanks, Dawn. I hope all</p> <p>11 is well in the Midwest. I will be sure to distribute this</p> <p>12 informations ASAP. I also drew up a couple ideas for</p> <p>13 memes with Mike in them. I've used the ones you've shared</p> <p>14 with me before. If there are any others that your team</p> <p>15 likes, please feel free to send them along and I can swap</p> <p>16 out our codes on them. When you have a second, please let</p> <p>17 me know what you think of the ones I've attached. The</p> <p>18 Facebook ads are generating around 1,000 to 1,500</p> <p>19 additional clicks a day to the MyPillow site. I hope they</p> <p>20 were converting to sales. FB is slowly starting to raise</p> <p>21 my daily spend limit, so hopefully I can kick it into high</p> <p>22 gear soon. Thanks again for everything. I really do</p> <p>23 appreciate all the -- all you guys have done for us."</p> <p>24 Do you see that?</p> <p>25 A. Yes.</p>
<p style="text-align: right;">Page 258</p> <p>1 BY MS. WRIGLEY:</p> <p>2 Q. I'm going to hand you what I'm marking as</p> <p>3 Exhibit 445. For the record, this is DEF030240, and it's</p> <p>4 a few pages attached to it. It also has an attachment</p> <p>5 Bates Stamped 030242.</p> <p>6 Looking at this document, do you see it's an</p> <p>7 email chain from March 31st, 2001 between yourself and</p> <p>8 Mark Blatterfein?</p> <p>9 A. Yes.</p> <p>10 Q. Who is Mark Blatterfein?</p> <p>11 A. He was an influencer.</p> <p>12 Q. Was he an influencer that did marketing to</p> <p>13 sell MyPillow products?</p> <p>14 A. Yes.</p> <p>15 Q. Did he have a promo code?</p> <p>16 A. Yes.</p> <p>17 Q. What is his promo code?</p> <p>18 A. I don't remember because he's no longer an</p> <p>19 influencer.</p> <p>20 Q. Looking at the email, do you see the first one</p> <p>21 in the chain is from you on March 31st at 1:19 p.m.?</p> <p>22 A. Yes.</p> <p>23 Q. It's on the first page. You write, "Hey,</p> <p>24 Mark. This documentary is out. Here is an exact link to</p> <p>25 Lindell-TV that brings up the press release and one-hour</p>	<p style="text-align: right;">Page 260</p> <p>1 Q. Okay. And it looks like based on this email</p> <p>2 at the time Mr. Blatterfein was doing promotional work</p> <p>3 using codes for MyPillow; correct?</p> <p>4 A. Yes, and I see his promo code was R45.</p> <p>5 THE REPORTER: Was what?</p> <p>6 THE WITNESS: R45.</p> <p>7 BY MS. WRIGLEY:</p> <p>8 Q. Got it. Thank you.</p> <p>9 So in the attachment -- in the attachment to</p> <p>10 this email, which is the meme idea he sent to you review,</p> <p>11 it includes his promo code; correct?</p> <p>12 A. Correct.</p> <p>13 Q. The promo code for Mr. Blatterfein is R45; is</p> <p>14 that right?</p> <p>15 A. That's correct.</p> <p>16 Q. Okay. And then, looking at this meme, is this</p> <p>17 the type of thing that you would have, like, reviewed or</p> <p>18 approved for any of the radio, podcast, or influencers to</p> <p>19 use?</p> <p>20 A. Probably. He was taken down because he made</p> <p>21 some horrible memes and posted them without us liking and</p> <p>22 he lost his privilege. So he's no longer with us.</p> <p>23 Q. Okay. Mr. Blatterfein?</p> <p>24 A. That's correct.</p> <p>25 Q. Okay. So he had some --</p>

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<p style="text-align: right;">Page 261</p> <p>1 A. He posted things without our approval.</p> <p>2 Q. Got it.</p> <p>3 And were some of the things offensive?</p> <p>4 A. Yes.</p> <p>5 Q. And you discontinued working with him?</p> <p>6 A. Correct.</p> <p>7 Q. Got it. Okay. What was that exhibit number?</p> <p>8 A. 445.</p> <p>9 Q. 445, thank you.</p> <p>10 Did you -- at the time, do you know whether</p> <p>11 any steps were taken by MyPillow to publish or air the</p> <p>12 Scientific Proof documentary on OAN?</p> <p>13 MS. OLIVER: Objection to form.</p> <p>14 You can answer.</p> <p>15 A. Not that I know of at all.</p> <p>16 BY MS. WRIGLEY:</p> <p>17 Q. Would you have any responsibilities in</p> <p>18 March of 2001 [sic] for arranging for the Scientific Proof</p> <p>19 documentary to be aired on the One America News network?</p> <p>20 A. No.</p> <p>21 Q. Okay. Do you know whether MyPillow paid for</p> <p>22 any airtime for Scientific Proof on OAN in March of 2021?</p> <p>23 A. I have no idea.</p> <p>24 Q. Okay. All right. Done with that one.</p> <p>25 Are you familiar with a podcast called</p>	<p style="text-align: right;">Page 263</p> <p>1 April 1st of 2021?</p> <p>2 A. Not that I'm aware of, no.</p> <p>3 Q. Okay. Would that have been -- that appearance</p> <p>4 have been discussed by Mr. Lindell with you before he went</p> <p>5 on the show?</p> <p>6 A. I don't know for sure.</p> <p>7 Q. Have you ever arranged any appearances by</p> <p>8 Mr. Lindell on the individual [sic] with John Stubbins</p> <p>9 podcast?</p> <p>10 A. I don't recall ever setting up an interview</p> <p>11 with him.</p> <p>12 Q. Okay. At this time, was Mr. Stubbins</p> <p>13 advertising MyPillow products with a promo code?</p> <p>14 A. Like I stated, he has one now. I don't know</p> <p>15 when he started.</p> <p>16 Q. Okay. If you look at the second screenshot in</p> <p>17 here, there's a Screenshot B, which is associated with the</p> <p>18 video time of 10 minutes, 25 seconds.</p> <p>19 Do you see that there's sort of a TV with a --</p> <p>20 A. Yes.</p> <p>21 Q. -- MyPillow visual.</p> <p>22 Do you see that?</p> <p>23 A. Yes, I do.</p> <p>24 Q. Actually, I don't know that there's a</p> <p>25 promo code, but there's a 1-800 number up there.</p>
<p style="text-align: right;">Page 262</p> <p>1 Indivisible with John Stubbins?</p> <p>2 A. Yes.</p> <p>3 Q. And in 2021, was that podcast doing marketing</p> <p>4 or advertising for MyPillow products?</p> <p>5 A. He's a current one. I don't know when he</p> <p>6 started.</p> <p>7 Q. Okay.</p> <p>8 (Whereupon, Exhibit 446 was marked.)</p> <p>9 BY MS. WRIGLEY:</p> <p>10 Q. I'm going to hand to you what's been marked as</p> <p>11 Exhibit 446. In the interest of time, I'll represent to</p> <p>12 you what this is for the record.</p> <p>13 It's associated with a video that was</p> <p>14 introduced and marked as an exhibit to the Supplemental</p> <p>15 Complaint in this case. On the very first page, it has</p> <p>16 "Exhibit 23." That is the exhibit number attached to the</p> <p>17 Supplemental Complaint in this case.</p> <p>18 This represents screenshots taken of a</p> <p>19 podcast, Indivisible with John Stubbins, that aired on</p> <p>20 April 1st, 2021. Each screenshot below it has information</p> <p>21 identifying the time within the podcast that the</p> <p>22 screenshot appears in.</p> <p>23 Just taking a look at these screenshots, are</p> <p>24 you familiar with an appearance by Mike Lindell on</p> <p>25 individual -- Indivisible with John Stubbins on</p>	<p style="text-align: right;">Page 264</p> <p>1 A. And that's our generic 800 number we have on</p> <p>2 our website.</p> <p>3 Q. Okay. So that's the generic number. That's</p> <p>4 not a 800 number associated with Mr. Stubbins?</p> <p>5 A. Correct.</p> <p>6 Q. Got it. Okay.</p> <p>7 Would Mr. Stubbins be compensated by MyPillow</p> <p>8 in any way for this appearance or this promotion of</p> <p>9 MyPillow during his podcast?</p> <p>10 A. I can't see anything because, my visual, I</p> <p>11 don't see a promo code.</p> <p>12 Q. Okay. Okay. All right. I'll spare us the</p> <p>13 video to be honest with you. Okay.</p> <p>14 I am going to have you watch another video.</p> <p>15 This is going to be marked Exhibit 447. My colleague is</p> <p>16 going to come around as before.</p> <p>17 (Whereupon, Exhibit 447 was marked.)</p> <p>18 BY MS. WRIGLEY:</p> <p>19 Q. And for the record, she's going to play</p> <p>20 portions of a video from a podcast called USA Watchdog.</p> <p>21 The video is very long. She's going to play a few</p> <p>22 minutes. She's going to start with playing the beginning</p> <p>23 of the podcast up until the 1-minute mark. Once we watch</p> <p>24 a minute, she's going to skip to the end, and she's going</p> <p>25 to play at the 45 minute, 53-second mark until the end.</p>

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<p style="text-align: right;">Page 265</p> <p>1 It's a long podcast, so we'll just watch a couple</p> <p>2 portions.</p> <p>3 (Video Played:</p> <p>4 GREG HUNTER: "I'm Greg Hunter. Welcome to</p> <p>5 usawatchdog.com.</p> <p>6 With us is a brand-new guest and a verifiable</p> <p>7 headline machine. He's a Christian man, he is the</p> <p>8 nightmare of legacy evil of propaganda media. That's why</p> <p>9 people on usawatchdog.com, I'm sure, will love him. He's</p> <p>10 being sued for more than a billion dollars. He's coming</p> <p>11 up with a social media platform that can handle more than</p> <p>12 a billion people, and he also says President Trump would</p> <p>13 be back in office by August, and he's come out with all</p> <p>14 kinds of other massive, verifiable proof of this election</p> <p>15 fraud, which I won't let go and neither will he -- and</p> <p>16 he's spent a lot more than I have on it.</p> <p>17 I'm talking about Mike Lindell, the creator</p> <p>18 and CEO of MyPillow. Of course, he has the Giza sheets,</p> <p>19 that moniker, the famous MyPillow, and also the mattress</p> <p>20 topper, and all that there.</p> <p>21 Mike Lindell, thank you for joining us today</p> <p>22 on usawatchdog.com.</p> <p>23 MIKE LINDELL: Well, thanks for having me on.</p> <p>24 GREG HUNTER: Well, I'm going to start right</p> <p>25 out of the bat. Wow, this is a big headline, and I want</p>	<p style="text-align: right;">Page 267</p> <p>1 well?</p> <p>2 MIKE LINDELL: Yep, yep. We have</p> <p>3 Absolute Interference coming out, and then we're going to</p> <p>4 have Absolute Coverup coming out.</p> <p>5 GREG HUNTER: Okay. Mike Lindell, the</p> <p>6 inventor and the CEO of MyPillow, Mike Lindell. I'll put</p> <p>7 up the links to your site, your sales page. I don't care</p> <p>8 whether you make -- because you're spending money on this.</p> <p>9 I'll put up that.</p> <p>10 Mike Lindell, thank you very much for joining</p> <p>11 us today on usawatchdog.com.</p> <p>12 MIKE LINDELL: Yeah, thanks.</p> <p>13 If you put it up, you can us ML33 and</p> <p>14 everybody can save a lot on the website, up to 66 percent.</p> <p>15 GREG HUNTER: Oh, ML33 is a code if you want</p> <p>16 to buy your sheets, your pillows.</p> <p>17 MIKE LINDELL: Everything. Yeah, you get</p> <p>18 discounts, great discounts.</p> <p>19 GREG HUNTER: Okay.</p> <p>20 MIKE LINDELL: It will help my employees. And</p> <p>21 God bless you.</p> <p>22 GREG HUNTER: Okay. Well, there you go.</p> <p>23 MIKE LINDELL: Yep, yep. Thank you.</p> <p>24 GREG HUNTER: Thanks a lot, Mike.</p> <p>25 Mike Lindell, the CEO of MyPillow. Thanks for joining us</p>
<p style="text-align: right;">Page 266</p> <p>1 to get an update to it." (Video stopped.)</p> <p>2 MS. WRIGLEY: And then, I'll have you go</p> <p>3 to the end, just to do it all at once. Play it 46:53 to</p> <p>4 the end.</p> <p>5 THE REPORTER: Play at what?</p> <p>6 MS. WRIGLEY: 46:53 to the end.</p> <p>7 (Video Played:</p> <p>8 MIKE LINDELL: "It didn't matter, but --</p> <p>9 defamation if you're not defaming them, if you're saying,</p> <p>10 'Here's what they did to our country,' and I have the</p> <p>11 evidence. I mean, that's like playing poker saying I have</p> <p>12 the winning hand, you got a Royal Flush. And they're</p> <p>13 going, 'No, you don't have a Royal Flush.'</p> <p>14 'Okay, we'll see.'</p> <p>15 GREG HUNTER: I also want to talk a little bit</p> <p>16 about -- I'm sorry, I'm holding you up.</p> <p>17 MIKE LINDELL: Yeah, I got to get on this</p> <p>18 other call.</p> <p>19 GREG HUNTER: Okay. Hold on. Last question.</p> <p>20 MIKE LINDELL: Yeah.</p> <p>21 GREG HUNTER: I got to promote this.</p> <p>22 You're going to have another story, another</p> <p>23 film about them covering, the whole second thing.</p> <p>24 MIKE LINDELL: Yep.</p> <p>25 GREG HUNTER: So you're going to do that as</p>	<p style="text-align: right;">Page 268</p> <p>1 today on usawatchdog.com. I really appreciate it.</p> <p>2 MIKE LINDELL: Yeah, thanks -- thanks a lot,</p> <p>3 Greg. God bless you. Thank you.</p> <p>4 GREG HUNTER: Yes, sir." (Video stopped.)</p> <p>5 BY MS. WRIGLEY:</p> <p>6 Q. Are you familiar with this gentleman from</p> <p>7 USA Watchdog?</p> <p>8 A. I am not.</p> <p>9 Q. Okay. Have you ever seen this USA Watchdog</p> <p>10 podcast?</p> <p>11 A. No.</p> <p>12 Q. In 2021, was USA Watchdog podcast one of</p> <p>13 the radio, podcast, influencers doing MyPillow</p> <p>14 marketing?</p> <p>15 A. No.</p> <p>16 Q. Okay. Do you know if there was any</p> <p>17 promo codes for this?</p> <p>18 A. No, there's not.</p> <p>19 Q. Okay. And would you have discussed or</p> <p>20 coordinated this appearance by Mr. Lindell on the</p> <p>21 USA Watchdog podcast?</p> <p>22 A. No.</p> <p>23 Q. Okay. And in terms of that code that they</p> <p>24 mentioned at the end there, ML33, I think you had</p> <p>25 mentioned earlier that that's Mike Lindell 33?</p>

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<p style="text-align: right;">Page 269</p> <p>1 A. Yes.</p> <p>2 Q. Is that sort of a generic code used?</p> <p>3 A. People have used it, I believe, yes.</p> <p>4 Q. Okay. But that's not specific to the</p> <p>5 USA Watchdog?</p> <p>6 A. No, it's been set up for years.</p> <p>7 Q. Set up for years, okay.</p> <p>8 And would you be able to track the amount of</p> <p>9 sales made from the use of that code connected to the</p> <p>10 promotion on the USA Watchdog podcast?</p> <p>11 A. I would imagine, yes.</p> <p>12 Q. Okay. Okay. I'm going to switch topics a</p> <p>13 little bit, and I want to talk about Frank or the</p> <p>14 FrankSpeech website.</p> <p>15 In April of 2021, did you have any</p> <p>16 responsibility or involvement in helping Mike Lindell to</p> <p>17 launch the FrankSpeech website?</p> <p>18 A. I have nothing to do with FrankSpeech.</p> <p>19 Q. Okay. Are you familiar with the FrankSpeech</p> <p>20 website?</p> <p>21 A. I have -- some of the podcasts have their</p> <p>22 shows on FrankSpeech, but I don't have anything to do with</p> <p>23 it.</p> <p>24 Q. Okay.</p> <p>25 (Whereupon, Exhibit 448 was marked.)</p>	<p style="text-align: right;">Page 271</p> <p>1 Seeing as Tom grew up in the TV business and his national</p> <p>2 file brand/show is very well known and respected in the</p> <p>3 populous movement, I thought Tom would be the perfect fit</p> <p>4 to be the interviewer," and then he continues.</p> <p>5 And on the very last sentence, he says, "Tom</p> <p>6 also has a lot of contacts in this community. I think it</p> <p>7 would be valuable for you two to discuss who else Tom may</p> <p>8 be able to connect the Frank and MyPillow teams with."</p> <p>9 Do you see that?</p> <p>10 A. Yes.</p> <p>11 Q. And then below his name, is kind of a short</p> <p>12 bio for Tom Pappert.</p> <p>13 Do you see that?</p> <p>14 A. Yes.</p> <p>15 Q. Remind me who Mark Blatterfein is.</p> <p>16 A. An influencer who was removed from MyPillow.</p> <p>17 Q. Okay. He was removed for offensive conduct?</p> <p>18 A. Correct.</p> <p>19 Q. Got it.</p> <p>20 But at the time, he was still doing</p> <p>21 influencing work for MyPillow?</p> <p>22 A. It looks like it at this time.</p> <p>23 Q. And then, he sent this introduction to connect</p> <p>24 you and Tom Pappert; correct?</p> <p>25 A. It looks like it.</p>
<p style="text-align: right;">Page 270</p> <p>1 BY MS. WRIGLEY:</p> <p>2 Q. I'm going to hand you what's marked as</p> <p>3 Exhibit 448.</p> <p>4 Do you see this is an email chain between you</p> <p>5 and -- well, let me strike that. It's an email chain from</p> <p>6 April 12, 2021.</p> <p>7 Do you see that?</p> <p>8 A. Yes.</p> <p>9 Q. At the bottom, it's an email from</p> <p>10 Mark Blatterfein to yourself along with Tom Pappert with</p> <p>11 the subject, "Lindell Interview."</p> <p>12 Do you see that?</p> <p>13 A. I do.</p> <p>14 Q. And then, you forward this to K.G. on the same</p> <p>15 day, kg@mypillow.com; correct?</p> <p>16 A. Correct.</p> <p>17 Q. That was Katelyn Gamlin?</p> <p>18 A. Right.</p> <p>19 Q. And Mr. Blatterfein sends this email stating,</p> <p>20 "Dawn, meet Tom, Tom, Dawn. Dawn is the marketing</p> <p>21 director for MyPillow and Mike's right hand. As her team</p> <p>22 prepares for the release of Frank -- (frankspeech.com)</p> <p>23 Mike will be doing interviews to make people aware of the</p> <p>24 launch. We want to make sure we take full advantage of</p> <p>25 the 5 million or so fans I have left on my FB pages.</p>	<p style="text-align: right;">Page 272</p> <p>1 Q. Okay. And in April of 2021, would it have</p> <p>2 been fair to describe you as Mike's right-hand man?</p> <p>3 A. No.</p> <p>4 Q. Or woman?</p> <p>5 A. No.</p> <p>6 Q. No? Okay.</p> <p>7 Would it have been fair to describe you as the</p> <p>8 marketing director?</p> <p>9 A. Yes.</p> <p>10 Q. Okay. And then, were you preparing for the</p> <p>11 release of frankspeech.com at this time?</p> <p>12 A. No, and that's why I forwarded it to Katelyn</p> <p>13 and didn't say anything, because I have nothing to do with</p> <p>14 FrankSpeech.</p> <p>15 Q. Okay. Was Katelyn Gamlin doing work to</p> <p>16 prepare for the launch of FrankSpeech?</p> <p>17 A. I don't know.</p> <p>18 MS. OLIVER: Objection to form.</p> <p>19 You can answer.</p> <p>20 A. I don't know what she's doing. All I knew is</p> <p>21 she could get this information to Mike if he was</p> <p>22 interested.</p> <p>23 BY MS. WRIGLEY:</p> <p>24 Q. Got it.</p> <p>25 And you forwarded it to Katelyn Gamlin at her</p>

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<p style="text-align: right;">Page 273</p> <p>1 MyPillow address?</p> <p>2 A. Yes.</p> <p>3 Q. Okay. Did you have any subsequent</p> <p>4 conversations about frankspeech.com or communications with</p> <p>5 either Mike -- Mark Blatterfein or Tom Pappert?</p> <p>6 A. No.</p> <p>7 Q. Okay. I'm going to hand to you what's been</p> <p>8 previously marked as Exhibit 60.</p> <p>9 (Whereupon, Exhibit 60 was introduced.)</p> <p>10 BY MS. WRIGLEY:</p> <p>11 Q. You see this is an email chain from April 17,</p> <p>12 2021?</p> <p>13 A. Yes.</p> <p>14 Q. And the first email in this chain is from</p> <p>15 R.J. Johnston. It says, "Hi Team. We directed Frank</p> <p>16 questions to the info@frankspeech.com email box. In a few</p> <p>17 minutes, I will be sharing our presentation video with all</p> <p>18 influencers. Can you please monitor that mailbox and</p> <p>19 provide a link or direct support to these people as</p> <p>20 needed."</p> <p>21 Do you see that?</p> <p>22 A. Yes.</p> <p>23 Q. Who is R.J. Johnston?</p> <p>24 A. I don't know if he's with FrankSpeech any</p> <p>25 longer. I know -- I had never met him before, but he was</p>	<p style="text-align: right;">Page 275</p> <p>1 BY MS. WRIGLEY:</p> <p>2 Q. I'm going to hand to you what's been marked as</p> <p>3 Exhibit 449, Bates Stamped DEF01842 with an attachment</p> <p>4 018413.</p> <p>5 Do you see this is an email from R.J. Johnston</p> <p>6 to Mike Lindell, yourself and then kg@mypillow.com?</p> <p>7 A. Yes.</p> <p>8 Q. The subject is, "List of Influencers."</p> <p>9 Do you see that?</p> <p>10 A. Yes.</p> <p>11 Q. The day is April 16, 2021. Mr. Johnson says,</p> <p>12 "Hi team. Attached is the list of influencers who</p> <p>13 requested accounts. Can you confirm them so we can begin</p> <p>14 sending invites."</p> <p>15 Do you see that?</p> <p>16 A. Yes.</p> <p>17 Q. And then, if you look at the attachment, are</p> <p>18 you familiar with this?</p> <p>19 A. I don't recall it, but it looks like a list of</p> <p>20 some of the people I work with, yes.</p> <p>21 Q. Okay. And does it include influencers that,</p> <p>22 at the time, were doing marketing for MyPillow?</p> <p>23 A. Yes.</p> <p>24 Q. Okay. And would you have done anything to</p> <p>25 confirm the individuals or entities on this list in</p>
<p style="text-align: right;">Page 274</p> <p>1 part of FrankSpeech at the time.</p> <p>2 Q. Okay. And then K.G., Katelyn Gamlin responded</p> <p>3 to his email; correct?</p> <p>4 A. Correct.</p> <p>5 Q. And she responded from her MyPillow email</p> <p>6 account; right?</p> <p>7 A. Yes.</p> <p>8 Q. And you're copied on this email along with</p> <p>9 Mike Lindell and then Brannon at worldviewweekend.com.</p> <p>10 Do you see that?</p> <p>11 A. Yes.</p> <p>12 Q. Okay. And did you have any role or</p> <p>13 involvement in connection with any sort of FrankSpeech</p> <p>14 training or presentation videos with influencers?</p> <p>15 A. I don't know if I ever watched any. I may</p> <p>16 have passed it on to influencers. I don't recall.</p> <p>17 THE REPORTER: You may have what?</p> <p>18 A. Passed it on to influencers so they could be</p> <p>19 instructed how to upload their podcast on FrankSpeech.</p> <p>20 BY MS. WRIGLEY:</p> <p>21 Q. And influencers would have been influencers</p> <p>22 doing MyPillow marketing at the time?</p> <p>23 A. Correct.</p> <p>24 Q. Okay.</p> <p>25 (Whereupon, Exhibit 449 was marked.)</p>	<p style="text-align: right;">Page 276</p> <p>1 connection with Mr. Johnston's email?</p> <p>2 A. No, I believe he reached out to them. I don't</p> <p>3 recall.</p> <p>4 Q. Okay. Did MyPillow ever provide any</p> <p>5 promo codes for Sidney Powell?</p> <p>6 A. Yes.</p> <p>7 Q. And did -- were there any MyPillow promo codes</p> <p>8 for Sidney Powell in 2021?</p> <p>9 A. I don't know when she started.</p> <p>10 Q. Are any of those codes still active?</p> <p>11 A. She has promo code SIDNEY.</p> <p>12 Q. Okay. Does she -- there a promo code "KRKN"</p> <p>13 or K-R-K-N?</p> <p>14 A. I don't recall. I would have to look that up.</p> <p>15 Q. And where does Sidney Powell promote or sell</p> <p>16 MyPillow products?</p> <p>17 A. On her social media, and I believe she has a</p> <p>18 podcast, I believe.</p> <p>19 Q. Okay. And does she have her own 1-800 number?</p> <p>20 A. She does.</p> <p>21 Q. Okay. And does Sidney Powell promote or sell</p> <p>22 MyPillow products in connection with talking about</p> <p>23 election fraud for the 2020 Presidential Election?</p> <p>24 MS. OLIVER: Objection to form.</p> <p>25 A. She sells MyPillow products.</p>

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<p style="text-align: right;">Page 277</p> <p>1 BY MS. WRIGLEY:</p> <p>2 Q. And is she one of MyPillow's influencers or</p> <p>3 radio, podcast influencers?</p> <p>4 A. Yes.</p> <p>5 Q. Okay. And have you communicated with</p> <p>6 Sidney Powell in connection with marketing for MyPillow in</p> <p>7 your job as marketing director?</p> <p>8 A. I don't communicate with Sidney at all. She</p> <p>9 has a rep that I work with.</p> <p>10 Q. Who's her rep?</p> <p>11 A. I only have her email. I can't recall her</p> <p>12 name. Maybe Bridget. I don't recall her name.</p> <p>13 Q. Okay. But you email a rep for Sidney Powell?</p> <p>14 A. They get sales reports every Monday, yes.</p> <p>15 Q. Okay. Sales reports.</p> <p>16 Do all of the your media -- strike that.</p> <p>17 Do all of radio, podcast, influencers get</p> <p>18 sales reports on a weekly basis?</p> <p>19 A. Yes.</p> <p>20 Q. Okay. And who sends out the report?</p> <p>21 A. Myself and my assistant.</p> <p>22 Q. Okay. And that's every week, every Monday?</p> <p>23 A. Every Monday.</p> <p>24 Q. Okay. And so, does Sidney Powell also get</p> <p>25 paid for any sales from MyPillow products that she</p>	<p style="text-align: right;">Page 279</p> <p>1 A. No.</p> <p>2 Q. But Maria or his rep would get, on a weekly</p> <p>3 basis, a sales report?</p> <p>4 A. Yes.</p> <p>5 Q. In fact, every -- strike that. Strike that.</p> <p>6 Are you familiar with the promo code</p> <p>7 100PERCENTFEDUP?</p> <p>8 A. Yes.</p> <p>9 Q. What media outlet or radio, podcast,</p> <p>10 influencer is connected with 100PERCENTFEDUP?</p> <p>11 A. It's called Economic Advisor is who I deal</p> <p>12 with. His name is Chris. I don't recall his last name,</p> <p>13 and he just has that promo code.</p> <p>14 Q. Okay. And does, I guess, any radio, podcast</p> <p>15 or influencer connected to that promo code ever market or</p> <p>16 sell or promote MyPillow products with a promo code in</p> <p>17 connection with any discussions of election fraud for the</p> <p>18 2020 Presidential Election?</p> <p>19 MS. OLIVER: Objection to form.</p> <p>20 You can answer.</p> <p>21 A. I do not know.</p> <p>22 BY MS. WRIGLEY:</p> <p>23 Q. Okay. Are you familiar with a documentary</p> <p>24 called Absolute Interference that Mike Lindell put out?</p> <p>25 A. I've heard of it.</p>
<p style="text-align: right;">Page 278</p> <p>1 generates?</p> <p>2 A. Yes, just like everyone else, 25 percent.</p> <p>3 Q. And is she using promo codes and getting paid</p> <p>4 from the sale of MyPillow products in 2023?</p> <p>5 A. In 2023, yes.</p> <p>6 Q. Okay. What about Rudy Giuliani; does</p> <p>7 Rudolph Giuliani have any MyPillow promo code codes?</p> <p>8 A. Yes.</p> <p>9 Q. And does he advertise or discuss MyPillow</p> <p>10 products in connection with discussing anything having to</p> <p>11 do with election fraud in connection with the 2020</p> <p>12 Presidential Election?</p> <p>13 MS. OLIVER: Objection to form.</p> <p>14 You can answer.</p> <p>15 A. I don't listen to his podcast. He sells</p> <p>16 MyPillow products, and he uses the Promo Code RUDY.</p> <p>17 BY MS. WRIGLEY:</p> <p>18 Q. Does he have any promo codes besides RUDY?</p> <p>19 A. He does not.</p> <p>20 Q. Okay. And does he get a weekly sales report</p> <p>21 from any MyPillow sales?</p> <p>22 A. He doesn't personally, but it goes to a rep.</p> <p>23 Q. Okay. Who is the rep for Rudolph Giuliani?</p> <p>24 A. I believe Maria.</p> <p>25 Q. Maria what, do you know?</p>	<p style="text-align: right;">Page 280</p> <p>1 Q. Have you ever watched it?</p> <p>2 A. No.</p> <p>3 Q. Did you have any role or responsibilities in</p> <p>4 sending or promoting the Absolute Interference documentary</p> <p>5 with any radio, podcast or influencers with MyPillow?</p> <p>6 A. I don't recall.</p> <p>7 Q. Did you have any role in helping to coordinate</p> <p>8 any appearances or interviews with Mike Lindell on any</p> <p>9 media outlets to promote Absolute Interference?</p> <p>10 A. Not to my knowledge.</p> <p>11 Q. Okay. Did you have any role in coordinating</p> <p>12 or launching the live streaming event, sometimes called</p> <p>13 Frankathon Live Stream?</p> <p>14 A. Nothing to do with that.</p> <p>15 Q. Okay. Did you set up any promo codes to be</p> <p>16 used for selling MyPillow products in connection with any</p> <p>17 Frankathon Live Stream?</p> <p>18 A. I set up hundreds of thousands of promo codes,</p> <p>19 so I set them up. I don't know what they're for.</p> <p>20 Q. Okay. Ms. Curtis, I'm going to hand to you</p> <p>21 what's been previously marked Exhibit 59.</p> <p>22 (Whereupon, Exhibit 59 was introduced.)</p> <p>23 BY MS. WRIGLEY:</p> <p>24 Q. It's an email chain from April 16, 2021.</p> <p>25 Do you see the first email at the bottom here</p>

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<p style="text-align: right;">Page 281</p> <p>1 is from K.G., Katelyn Gamlin, at MyPillow and she states,</p> <p>2 "Hello. Thank you for participating in Mike Lindell's</p> <p>3 Frankathon live streaming event. We have you confirmed</p> <p>4 for April 20th, 12:30 p.m. to 1:15 p.m. CT. You can be on</p> <p>5 12:30 p.m. to 1:30 p.m. CT if your schedule allows.</p> <p>6 Topic, Absolute Interference documentary/Frank Speech.</p> <p>7 We'll be Skyping you at eric.metaxas."</p> <p>8 And then, she continues to say, "The Skype</p> <p>9 request will come today from mlooffice365@mypillow.com, run</p> <p>10 backup number for any issues," and gives a number.</p> <p>11 Do you see that?</p> <p>12 A. I do.</p> <p>13 Q. And then, in the next email, she sends it to</p> <p>14 Paul Erickson, eric@ericmetaxas.com, and you're copied on</p> <p>15 this email.</p> <p>16 Do you see that?</p> <p>17 A. I do.</p> <p>18 Q. Okay. And at the time, did you have any roles</p> <p>19 or responsibilities in connection with this Frankathon</p> <p>20 live streaming event?</p> <p>21 A. No.</p> <p>22 Q. Do you know why she would have copied you on</p> <p>23 this email?</p> <p>24 A. I do not. I work with Eric as a MyPillow</p> <p>25 advertiser. I don't know if that's why.</p>	<p style="text-align: right;">Page 283</p> <p>1 released.</p> <p>2 Q. Okay. If you look at -- back at the texts --</p> <p>3 you can just put that to the side, page 71.</p> <p>4 Do you see on April 19, 2021, that Mr. Lindell</p> <p>5 at 5:22 p.m. texts you, "Set up Promo Code FRANK1"?</p> <p>6 A. Yes.</p> <p>7 Q. "Let me know when it's up."</p> <p>8 Do you see that?</p> <p>9 A. I do.</p> <p>10 Q. And then, you responded, "Doing it now."</p> <p>11 Do you see that?</p> <p>12 A. Yes.</p> <p>13 Q. And did you set that promo code up?</p> <p>14 A. I would imagine once Mike told me to set it</p> <p>15 up, I assume.</p> <p>16 Q. Okay. And what is "FRANK" associated with?</p> <p>17 A. FrankSpeech.</p> <p>18 Q. Okay. And so, there's a promo code for</p> <p>19 FrankSpeech?</p> <p>20 A. "FRANK" is FrankSpeech.</p> <p>21 Q. Got it.</p> <p>22 And then, he responded, "Actually, just set up</p> <p>23 FRANK2."</p> <p>24 Do you see that?</p> <p>25 A. I do.</p>
<p style="text-align: right;">Page 282</p> <p>1 Q. Okay. And I'm going to have you go back to</p> <p>2 the text in one of these spiral-bounds. This is</p> <p>3 Exhibit 437, and I'm going to have you go to page 71.</p> <p>4 Do you see that the text on this page at the</p> <p>5 top starts at April 19, 2021.</p> <p>6 Do you see that?</p> <p>7 A. Yes.</p> <p>8 Q. Okay.</p> <p>9 (Whereupon, Exhibit 450 was marked.)</p> <p>10 BY MS. WRIGLEY:</p> <p>11 Q. And I'm going to hand to you -- keep that out,</p> <p>12 but I'm going to hand to you what's been marked as</p> <p>13 Exhibit 450. I'll represent for the record this is</p> <p>14 Exhibit 6 to the Supplemental Complaint in this case.</p> <p>15 These are screenshots of particular points of the video of</p> <p>16 Absolute Interference. Each screenshot is associated with</p> <p>17 a time in which it appears.</p> <p>18 If you look at that first screenshot in</p> <p>19 Exhibit 450, does that refresh your recollection on</p> <p>20 whether you've seen this Absolute Interference video or</p> <p>21 documentary?</p> <p>22 A. I don't recall seeing it, no.</p> <p>23 Q. Okay. Do you recall that it was released in</p> <p>24 April of 2021?</p> <p>25 A. I don't recall it, either, the date it was</p>	<p style="text-align: right;">Page 284</p> <p>1 Q. And he says, "Frank, Frank."</p> <p>2 What's that a reference to?</p> <p>3 A. I don't know.</p> <p>4 Q. And you say, "Done"; right?</p> <p>5 A. That's correct.</p> <p>6 Q. And he responds, "And FRANK1."</p> <p>7 Do you see that?</p> <p>8 A. I do.</p> <p>9 Q. Okay. And then on the next page, you respond,</p> <p>10 "Both are done."</p> <p>11 Do you see that?</p> <p>12 A. I do.</p> <p>13 Q. Okay. And do you see that he says, after</p> <p>14 that, "Thanks." Spells it wrong. "Are you listening or</p> <p>15 watching?"</p> <p>16 Do you see that?</p> <p>17 A. Uh-huh.</p> <p>18 Q. And then you say, "Yes, it's awesome. A spike</p> <p>19 just now."</p> <p>20 Do you see that?</p> <p>21 A. Yes.</p> <p>22 Q. And on this day, do you know what you were</p> <p>23 listening or watching?</p> <p>24 A. I'm guessing I fibbed because I was already at</p> <p>25 home, and I didn't watch it.</p>

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<p style="text-align: right;">Page 285</p> <p>1 Q. Got it.</p> <p>2 You told him you were watching, but you might</p> <p>3 not have been?</p> <p>4 A. That's correct.</p> <p>5 Q. Got it.</p> <p>6 And then, he says on that text, "Is promo code</p> <p>7 FRANK on there?"</p> <p>8 Do you see that?</p> <p>9 A. I do.</p> <p>10 Q. You say, "Yes, that has brought in \$80,000</p> <p>11 already."</p> <p>12 Is that right?</p> <p>13 A. That's what it says.</p> <p>14 Q. And that would have been \$80,000 for the day;</p> <p>15 correct?</p> <p>16 A. Yes.</p> <p>17 Q. Okay. And then, if you go to the next page on</p> <p>18 73, this is a text from April 20, 2021.</p> <p>19 Do you see that?</p> <p>20 A. Yes.</p> <p>21 Q. And you list a number of, sort of, your radio,</p> <p>22 podcast, influencers and their, sort of, daily amounts;</p> <p>23 correct?</p> <p>24 A. Yes.</p> <p>25 Q. And what's the top one up there?</p>	<p style="text-align: right;">Page 287</p> <p>1 A. Yes.</p> <p>2 Q. The top one is Frank at \$118,000; correct?</p> <p>3 A. Yes.</p> <p>4 Q. If you go to 76, there's another text from</p> <p>5 you, and the top one reporting numbers is Frank, again,</p> <p>6 with \$80,000; right?</p> <p>7 A. Yes.</p> <p>8 Q. And that's a daily number; correct?</p> <p>9 A. It looks like it.</p> <p>10 Q. Okay. Then I want to go to page 77. There's</p> <p>11 texts at the top. There's one from April 27, 2021.</p> <p>12 Do you see that?</p> <p>13 A. I do.</p> <p>14 Q. Okay. And below where you report the numbers,</p> <p>15 you have a text to Mr. Lindell, "I have Brannon and Mary</p> <p>16 Fanning's wire information. Do you want money sent for</p> <p>17 the documentary or Frankathon?"</p> <p>18 Do you see that?</p> <p>19 A. Yes.</p> <p>20 Q. And did you have any role in coordinating</p> <p>21 getting a wire to Brannon Howse or Mary Fanning in</p> <p>22 connection with any payment for the documentary of your</p> <p>23 Frankathon reference there?</p> <p>24 A. Like I said, I don't send any money, but it</p> <p>25 looks like I, obviously, have their wire information, but</p>
<p style="text-align: right;">Page 286</p> <p>1 A. Frank.</p> <p>2 Q. And it's for over \$300,000; correct?</p> <p>3 A. Correct.</p> <p>4 Q. And you sent that text to Mike Lindell; right?</p> <p>5 A. Correct.</p> <p>6 Q. And then, he says, "Send me the spike";</p> <p>7 correct?</p> <p>8 A. Yes.</p> <p>9 Q. And then, you sent this attachment. And do</p> <p>10 you see it doesn't have the attachment but just sort of</p> <p>11 has a reference to it?</p> <p>12 A. Yes.</p> <p>13 Q. And would that have been a screenshot from</p> <p>14 Annaware?</p> <p>15 A. It's possible, yes.</p> <p>16 Q. Okay. Okay.</p> <p>17 And if you go to the next page on 74, this has</p> <p>18 got the numbers for April 21, 2021; correct?</p> <p>19 A. Yes.</p> <p>20 Q. The top one is Frank that you sent; correct?</p> <p>21 A. Yes.</p> <p>22 Q. It's \$224,000, right?</p> <p>23 A. Yes.</p> <p>24 Q. And if you go to page 75, we're at April 22,</p> <p>25 2021; right?</p>	<p style="text-align: right;">Page 288</p> <p>1 I do not send anything.</p> <p>2 Q. Okay. But would you have communicated with</p> <p>3 the accounting department in order for them to get paid</p> <p>4 for their work on the Frankathon?</p> <p>5 A. That's possible by the look of the text</p> <p>6 message.</p> <p>7 Q. Okay. And where would you have gotten the</p> <p>8 wire information from Brannon and Mary Fanning?</p> <p>9 A. From themselves because I don't know who else</p> <p>10 has their bank information.</p> <p>11 Q. And how do you communicate with Brannon or</p> <p>12 Mary Fanning?</p> <p>13 A. I don't know if it was text or phone or email.</p> <p>14 I don't know.</p> <p>15 Q. Okay. And did you have an understanding at</p> <p>16 this time that they were getting paid by MyPillow for work</p> <p>17 that they did in executive producing or putting on the</p> <p>18 Frankathon?</p> <p>19 A. I have no idea who paid them. I'm sure the</p> <p>20 accountant had several accounts he deals with.</p> <p>21 Q. Okay.</p> <p>22 A. Not just MyPillow.</p> <p>23 Q. But this is work you would have been doing in</p> <p>24 your position as marketing director of MyPillow?</p> <p>25 A. I work with Brannon Howse for the marketing</p>

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<p style="text-align: right;">Page 289</p> <p>1 part, so I already had his bank information. I don't know</p> <p>2 about Mary Fanning.</p> <p>3 Q. Okay. And after this point in time, were</p> <p>4 additional Frank promo codes set up to sell MyPillow</p> <p>5 products?</p> <p>6 A. I believe Frank 1 through 1,000 is set up.</p> <p>7 Q. Okay. 1 through 1,000?</p> <p>8 A. Or 999, excuse me.</p> <p>9 Q. And that's 1,000 promo codes.</p> <p>10 Does any other sort of -- are there any other</p> <p>11 promo codes that have a thousand numbers associated with</p> <p>12 them?</p> <p>13 A. See 1 through 999, we have a bunch of</p> <p>14 different, TOP1 through 999. That's a topper commercial.</p> <p>15 A lot of our commercials we set up 1 through 999, always.</p> <p>16 Q. Got it.</p> <p>17 If you go to -- and just flip through a little</p> <p>18 bit to page 83, and looking at text from May 7th, 2021.</p> <p>19 Do you see you're reporting numbers on there,</p> <p>20 and then, in response, Mr. Lindell says, "How much Frank"?</p> <p>21 A. Yes.</p> <p>22 Q. You respond, "\$42,877."</p> <p>23 Do you see that?</p> <p>24 A. Yes.</p> <p>25 Q. And then on the next day, May 8th, 2021, you</p>	<p style="text-align: right;">Page 291</p> <p>1 Q. Okay. Do you know if it gets 50/50 split,</p> <p>2 Frank?</p> <p>3 A. I don't know. I don't know if it did back</p> <p>4 then, but I have no idea what it is now, so.</p> <p>5 Q. And do you send a weekly report of the Frank</p> <p>6 numbers on Monday like you do for the rest of the TV and</p> <p>7 podcast or influencers?</p> <p>8 A. I do not.</p> <p>9 Q. You do not?</p> <p>10 A. No.</p> <p>11 Q. Okay. So there's no entities that those</p> <p>12 numbers get sent to?</p> <p>13 A. No.</p> <p>14 Q. Okay. Do you arrange for payment to Frank for</p> <p>15 the 50/50 split?</p> <p>16 A. The controller will -- every month I send</p> <p>17 Frank numbers to the controller, and then, they do what</p> <p>18 they want with them.</p> <p>19 Q. Okay.</p> <p>20 A. I don't know.</p> <p>21 Q. Who's the controller?</p> <p>22 A. Michael Thomas.</p> <p>23 Q. Michael Thomas.</p> <p>24 So every month, you send --</p> <p>25 A. The amount of Frank sales that came in.</p>
<p style="text-align: right;">Page 290</p> <p>1 reported, "Frank sales from yesterday \$43,000"; correct?</p> <p>2 A. Yes.</p> <p>3 Q. And if you go to the next page 84, it has</p> <p>4 numbers for May 10th, 2021; correct?</p> <p>5 A. Yes.</p> <p>6 Q. And the top -- the first one listed there is</p> <p>7 Frank last week \$277,100.</p> <p>8 Do you see that?</p> <p>9 A. Yes.</p> <p>10 Q. Mr. Lindell responds, "Frank is an exact</p> <p>11 50/50.</p> <p>12 Do you see that?</p> <p>13 A. Yes.</p> <p>14 Q. What's that a reference to?</p> <p>15 A. I would imagine the split that they get.</p> <p>16 Q. And is that MyPillow gets 50 percent of the</p> <p>17 revenue from the sales of MyPillow products using the</p> <p>18 Frank codes, and then, what other entity gets the other</p> <p>19 50 percent of the revenue?</p> <p>20 A. I don't know. That's a controller question or</p> <p>21 a Mike Lindell question.</p> <p>22 Q. Okay. And that 50 percent is different than</p> <p>23 the standard 25 percent that any radio, podcast and</p> <p>24 influencers get from the use of promo codes?</p> <p>25 A. I don't know how that works on the Frank side.</p>	<p style="text-align: right;">Page 292</p> <p>1 Q. Got it.</p> <p>2 So every month you send the amount of Frank</p> <p>3 sales that come in. Those numbers go to the controller,</p> <p>4 and the controller, from there -- this is the controller</p> <p>5 of MyPillow -- decides how payment gets allocated?</p> <p>6 A. I'm guessing he's been told by Mike Lindell</p> <p>7 how to allocate, yes.</p> <p>8 Q. Got it. Got it. Okay. Thank you.</p> <p>9 I want to talk about another documentary in</p> <p>10 the Absolute Proof series.</p> <p>11 Are you familiar with the documentary called</p> <p>12 Absolute 9-0?</p> <p>13 A. No.</p> <p>14 Q. All right. I'm going to back up, and we'll go</p> <p>15 back to Absolute 9-0, and I'm going so have you look at</p> <p>16 Exhibit 451 first.</p> <p>17 (Whereupon, Exhibit 451 was marked.)</p> <p>18 BY MS. WRIGLEY:</p> <p>19 Q. Looking at Exhibit 451, do you see this is an</p> <p>20 email from Pete Santilli on April 21, 2021, subject line,</p> <p>21 "Stats/Background FYI (if you need it)."</p> <p>22 It's sent to kg@mypillow.com. That's</p> <p>23 Katelyn Gamlin and yourself?</p> <p>24 A. I see that, yes.</p> <p>25 Q. And do you see that Mr. Santilli states,</p>

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<p style="text-align: right;">Page 293</p> <p>1 "Good morning, Katelyn and Dawn. Just in case you're 2 still considering booking me for a slot with Mike Lindell 3 this week, I wanted to provide you with some 4 stats/background that would make the statement even more 5 interesting and informative if the opportunity come about. 6 We ran a parallel stream of our network channels of the 7 28-hour broadcast, and we're still running the stream on 8 our 24-hour channel. We have groups of yours who enjoy 9 the benefits of realtime chat during our broadcast, and 10 the response to Absolute Interference was overwhelmingly 11 positive." 12 Do you see that? 13 A. I do. 14 Q. Okay. And at this point in time, was 15 Mr. Santilli communicating with you and Ms. Gamblin about 16 statistics for his show and then the response to 17 Absolute Interference? 18 A. I don't recall responding to it because 19 Katelyn schedules Mike's -- 20 Q. Appearances? 21 A. -- appearances. 22 Q. Okay. Ms. Gamblin schedules Mike's 23 appearances? 24 A. That's correct. 25 Q. And that would be his appearances to promote</p>	<p style="text-align: right;">Page 295</p> <p>1 Q. He continues, "Right before Mike came on my 2 show for an interview, I insisted on getting a promo code 3 to help offset the ban of MyPillow by Bed Bath & Beyond 4 and Kohl's. As I recall, I told Mike I wasn't expecting 5 anything out of it. I just wanted to help him however I 6 could by telling our audience to stop --" I think he meant 7 step up "-- and support him. Dawn was on vacation, but 8 she was able to set up my affiliate account." 9 Do you see that? 10 A. Yes. 11 Q. What's an affiliate account? 12 A. The same thing that -- influencers, 13 podcasters, radio stations. 14 Q. Okay. They get an account where they're 15 associated with a promo code? 16 A. That's correct. 17 Q. Okay. And then, do they have access to 18 anything in MyPillow, or is it just like a promo code 19 setup? 20 A. They do not have access to anything. 21 Q. Okay. Got it. 22 And then, if you continue down to the sort 23 of end of this email, the last couple paragraphs 24 before he signs off, do you see that he refers to 25 having the opportunity to broadcast his show on</p>
<p style="text-align: right;">Page 294</p> <p>1 MyPillow? 2 MS. OLIVER: Objection to form. 3 You can answer. 4 A. I don't know what she does. So this -- I was 5 working with Pete Santilli, obviously, at this time, so 6 maybe that's why he copied me on it. 7 BY MS. WRIGLEY: 8 Q. Okay. And then, Mr. Santilli goes through a 9 number of points under this section, "General stats 10 regarding our show." 11 Do you see that? 12 A. I do. 13 Q. In the first one, he says, "We launched our 14 show in December 2011. Since we started covering 15 controversial topics such as 911, Obama and administration 16 corruption and globalism, we've experienced censorship 17 before it became a household word." 18 Do you see that? 19 A. I do. 20 Q. And then, he continues onto the next page with 21 a number -- a number of points through 11, and then after 22 that, do you see where he states, "As both of you may 23 already know." 24 Do you see that? 25 A. Yes.</p>	<p style="text-align: right;">Page 296</p> <p>1 frankspeech.com? 2 Do you see that? 3 A. Yes. 4 Q. Okay. And does Pete Santilli broadcast his 5 show on frankspeech.com? 6 A. I believe he does, yes. 7 Q. Okay. And does he use MyPillow promo codes in 8 connection with that broadcast on FrankSpeech? 9 A. He promotes my MyPillow products, yes. 10 Q. And his code is PETE? 11 A. Correct. 12 Q. Got it. Okay. And -- okay. 13 So you can put that aside. 14 MS. OLIVER: Would you mind if we took a 15 five-minute break? 16 MS. WRIGLEY: Let's take it. Let's go 17 off the record. 18 THE VIDEOGRAPHER: We are going off the 19 record. The time now is 3:34 p.m. and this concludes 20 Media Unit Number 4. 21 (Whereupon, a recess was taken from 22 3:34 p.m. to 3:47 p.m.) 23 THE VIDEOGRAPHER: We are going back on 24 the record at 3:47 p.m. This is the beginning of Media 25 Unit Number 5.</p>

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<p style="text-align: right;">Page 297</p> <p>1 BY MS. WRIGLEY:</p> <p>2 Q. Ms. Curtis, I'm going to hand to you</p> <p>3 Exhibit 452.</p> <p>4 (Whereupon, Exhibit 452 was marked.)</p> <p>5 BY MS. WRIGLEY:</p> <p>6 Q. For the record, this is Exhibit 8 attached to</p> <p>7 the Supplemental Complaint in this case, and it is the</p> <p>8 screenshot from what was a video of Absolute 9-0 dated</p> <p>9 June 5th, 2021, and the screenshots represent different</p> <p>10 points in time in the video.</p> <p>11 I asked you about 9-0 earlier, and I believe</p> <p>12 you said you weren't familiar with it?</p> <p>13 A. Not really, No.</p> <p>14 Q. Looking at these screenshots, does this</p> <p>15 refresh your recollection about whether you ever knew</p> <p>16 about or have watched Absolute 9-0?</p> <p>17 A. I haven't watched it. I believe I remember</p> <p>18 hearing about it.</p> <p>19 Q. Is it your understanding this is a documentary</p> <p>20 that Mike Lindell released related to his Absolute Proof</p> <p>21 series?</p> <p>22 A. Yes.</p> <p>23 Q. And did you have any role in creating content</p> <p>24 or developing Absolute 9-0?</p> <p>25 A. No.</p>	<p style="text-align: right;">Page 299</p> <p>1 Q. Did you send it to anyone besides</p> <p>2 Pete Santilli?</p> <p>3 A. I'm not sure.</p> <p>4 Q. Okay. And why would you have sent this email</p> <p>5 to him with the link to Absolute 9-0?</p> <p>6 A. Mike requested that I do.</p> <p>7 Q. Okay. And you sent this from your MyPillow</p> <p>8 email address?</p> <p>9 A. That's correct.</p> <p>10 Q. Mr. Santilli responded and said, "Done. Can I</p> <p>11 get Mr. Lindell scheduled to come on my show as soon as</p> <p>12 his schedule permits?"</p> <p>13 Do you see that?</p> <p>14 A. I do.</p> <p>15 Q. Would you have coordinated any appearance by</p> <p>16 Mr. Lindell on Pete Santilli's show?</p> <p>17 A. I didn't. I'm guessing that's why he put</p> <p>18 Katelyn on this.</p> <p>19 Q. Okay. And then, go back to the -- one of the</p> <p>20 spiral bounds with the text, and this one is Exhibit 337</p> <p>21 [sic]. I'm going to ask you to go to page 100. I want to</p> <p>22 have you look at a text from June 3rd, 2021 that you sent</p> <p>23 out.</p> <p>24 A. Okay.</p> <p>25 Q. And on June 3rd, do you see that you reported</p>
<p style="text-align: right;">Page 298</p> <p>1 Q. Okay. I'm going to hand to you what's been</p> <p>2 marked as Exhibit 453.</p> <p>3 (Whereupon, Exhibit 453 was marked.)</p> <p>4 BY MS. WRIGLEY:</p> <p>5 Q. For the record, it's Bates Stamped DEF122361.</p> <p>6 This is an email chain from June 3rd, 2021; correct?</p> <p>7 A. Yes.</p> <p>8 Q. And do you see that you're included on this</p> <p>9 email chain, it also includes K.G., katelyn@mypillow.com</p> <p>10 and Pete Santilli?</p> <p>11 A. Yes.</p> <p>12 Q. And if you look at the first email in this</p> <p>13 chain, do you see on June 3rd, 2021 at 3:13 p.m., you</p> <p>14 wrote, "Help save our country and share this everywhere."</p> <p>15 Do you see that?</p> <p>16 A. Yes.</p> <p>17 Q. And there's a link at the bottom, and if you</p> <p>18 kind of look at the information in this link, it's got</p> <p>19 michaeljlindell.com/download/absolute90."</p> <p>20 Do you see that?</p> <p>21 A. Yes.</p> <p>22 Q. And in June of 2021, did you send the link to</p> <p>23 Absolute 9-0 to any radio, podcast or influencers that</p> <p>24 were doing marketing for MyPillow?</p> <p>25 A. It looks like from this email, I did.</p>	<p style="text-align: right;">Page 300</p> <p>1 Frank to have \$7,150 in sales?</p> <p>2 Do you see that?</p> <p>3 A. Yes.</p> <p>4 Q. And that would have been daily sales?</p> <p>5 A. Yes.</p> <p>6 Q. Okay. And then, Mr. Lindell responds and</p> <p>7 says, "You need to add the Franks together, all of them."</p> <p>8 Do you see that?</p> <p>9 A. Yes.</p> <p>10 Q. What was that a reference to?</p> <p>11 A. If I had to guess, all the Frank promo codes.</p> <p>12 Q. Okay. And if you continue into this text</p> <p>13 chain, you responded to him and said, "Okay, I will send</p> <p>14 in a moment." You say, "Yesterday, \$16,945."</p> <p>15 Do you see that?</p> <p>16 A. Yes.</p> <p>17 Q. And then, he responds, "Kool-aid."</p> <p>18 Do you see that?</p> <p>19 A. Yes.</p> <p>20 Q. And then, you respond, "Do you want to run</p> <p>21 cash buys for Salem FrankSpeech?"</p> <p>22 Do you see that?</p> <p>23 A. Yes.</p> <p>24 Q. What was that a reference to?</p> <p>25 A. If he wants to -- Salem is a rev split.</p>

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<p style="text-align: right;">Page 301</p> <p>1 Q. Yeah.</p> <p>2 A. Does he want to do cash buys on FrankSpeech</p> <p>3 with them.</p> <p>4 Q. Got it.</p> <p>5 And then he responded, "In what?"</p> <p>6 Do you see that?</p> <p>7 A. Yes.</p> <p>8 Q. And you responded, "Phil Boyce said he wanted</p> <p>9 to run spots to talk about the rally."</p> <p>10 Do you see that?</p> <p>11 A. I see that.</p> <p>12 Q. Who is Phil Boyce?</p> <p>13 A. He is the -- probably the vice president of</p> <p>14 Salem Media. I don't know his title exactly.</p> <p>15 Q. What was the rally?</p> <p>16 A. I don't know.</p> <p>17 Q. Okay. If you go one page further, directing</p> <p>18 your attention to 102, this is -- continues at -- this is</p> <p>19 still a continuation of a text from June 3rd, 2021.</p> <p>20 Do you see that Mr. Lindell at 5:46 p.m. sends</p> <p>21 a text to you stating, "Get the downloadable version from</p> <p>22 Todd to send to all the radio and influencers."</p> <p>23 Do you see that?</p> <p>24 A. Yes.</p> <p>25 Q. You responded, "What do you want for</p>	<p style="text-align: right;">Page 303</p> <p>1 Are you familiar with a Cyber Symposium that</p> <p>2 Mr. Lindell held in August of 2021?</p> <p>3 A. I'm aware he held one, yes.</p> <p>4 Q. Did you attend the Cyber Symposium?</p> <p>5 A. I did not.</p> <p>6 Q. Have you ever watched any video or portions of</p> <p>7 the Cyber Symposium?</p> <p>8 A. I watched a little bit, yes.</p> <p>9 Q. Okay. What was your understanding of the</p> <p>10 information that was covered or relayed at the</p> <p>11 Cyber Symposium?</p> <p>12 A. I don't really care what was said, to be</p> <p>13 honest.</p> <p>14 Q. Why don't you care?</p> <p>15 A. Because I was so busy with MyPillow stuff,</p> <p>16 I was just kind of watching it in-between. So I</p> <p>17 didn't really -- wasn't really absorbing all the</p> <p>18 information.</p> <p>19 Q. Did you have any role or responsibilities as</p> <p>20 part of your job at MyPillow for anything having to do</p> <p>21 with the Cyber Symposium?</p> <p>22 A. No.</p> <p>23 Q. I'm going to hand to you what I'm marking as</p> <p>24 an Exhibit 454.</p> <p>25 (Whereupon, Exhibit 454 was marked.)</p>
<p style="text-align: right;">Page 302</p> <p>1 verbiage?"</p> <p>2 Do you see that?</p> <p>3 A. Yes.</p> <p>4 Q. And he responded, "Please share this</p> <p>5 everywhere."</p> <p>6 Do you see that?</p> <p>7 A. Yes.</p> <p>8 Q. Okay. And what was the downloadable version</p> <p>9 that he was referencing in terms of sending to all radio</p> <p>10 and influencers?</p> <p>11 A. I don't know. That was two years ago.</p> <p>12 Q. Okay. If you look back to Exhibit 453, was</p> <p>13 the email chain including Pete Santilli, and your original</p> <p>14 email where he said, "Help save our country and share this</p> <p>15 everywhere" with the Absolute 9-0 link.</p> <p>16 Does this refresh your recollection about</p> <p>17 whether the downloadable version to send to radio</p> <p>18 influencers was Absolute 9-0?</p> <p>19 A. That's what it looks like it would be.</p> <p>20 Q. Okay. And would you have, in fact, in</p> <p>21 accordance with the direction from Mr. Lindell, in the</p> <p>22 text, have sent this out?</p> <p>23 A. Yes, as per his request.</p> <p>24 Q. Okay. I want to move on and talk about</p> <p>25 another event in 2021.</p>	<p style="text-align: right;">Page 304</p> <p>1 BY MS. WRIGLEY:</p> <p>2 Q. For the record, it's Exhibit 33 attached to</p> <p>3 the Supplemental Complaint. And I'll represent these are</p> <p>4 screenshots taken from a video, a portion of the video of</p> <p>5 the Cyber Symposium, and each screenshot has information</p> <p>6 at the bottom at the point in time in the video, that the</p> <p>7 image appears for the Cyber Symposium.</p> <p>8 Kind of looking through these screenshots,</p> <p>9 does this look familiar in connection with any parts that</p> <p>10 you might have viewed from the Cyber Symposium from</p> <p>11 August of 2021?</p> <p>12 A. Yes.</p> <p>13 Q. Okay. And did you create any promo codes that</p> <p>14 would be used in connection with the Cyber Symposium?</p> <p>15 A. Not that I'm aware of. I don't recall.</p> <p>16 Q. Okay. Did Mike Lindell create or advertise</p> <p>17 the Cyber Symposium in connection with the use of</p> <p>18 promo codes for MyPillow?</p> <p>19 MS. OLIVER: Objection to form.</p> <p>20 You can answer.</p> <p>21 A. I don't recall. I don't remember.</p> <p>22 BY MS. WRIGLEY:</p> <p>23 Q. I'm going to hand to you what's marked as</p> <p>24 Exhibit 455.</p> <p>25 (Whereupon, Exhibit 455 was marked.)</p>

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<p style="text-align: right;">Page 305</p> <p>1 BY MS. WRIGLEY:</p> <p>2 Q. It's Bates Stamped DEF034440, and then I'm</p> <p>3 going to sort of represent that in connection with</p> <p>4 production by the defendants of your text messages, any</p> <p>5 sort of attachments or things that you included embedded</p> <p>6 were produced, sort of, after the original text chain.</p> <p>7 So if you look at -- I'm going to have you put</p> <p>8 this exhibit with Exhibit 437, and I'll direct you to the</p> <p>9 last page of the exhibit, which I think is on 145. And</p> <p>10 this Exhibit 455 matches up with the attachment that goes</p> <p>11 with the text from July 28, 2021 that you sent, which is</p> <p>12 on page 145 of the text.</p> <p>13 Do you see that?</p> <p>14 A. Yes.</p> <p>15 Q. Okay. And then, looking at this, sort of,</p> <p>16 Exhibit 455 that was sort of produced, do you recognize</p> <p>17 the information appearing on this exhibit?</p> <p>18 A. On this piece of paper here?</p> <p>19 Q. Uh-huh.</p> <p>20 A. No.</p> <p>21 Q. Okay. Do you see that Mike Lindell appears</p> <p>22 here, and then he's got, sort of, like a MyPillow thing</p> <p>23 below him that says, "Flash Sale," and then it kind of has</p> <p>24 a blank for use of promo code?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 307</p> <p>1 A. I do.</p> <p>2 Q. Okay. And how would that have worked without</p> <p>3 a promo code listed?</p> <p>4 A. I don't know how it would have worked with my</p> <p>5 radio stations, regardless.</p> <p>6 Q. Okay. What about any shows that had sort of</p> <p>7 video attached to them?</p> <p>8 A. Somebody would have to tag that in there for</p> <p>9 them, and I don't believe it was ever done.</p> <p>10 Q. Okay. And if he said they can use any</p> <p>11 promo code, would that have meant that if someone</p> <p>12 advertised or put this spot on their podcast, like</p> <p>13 Pete Santilli, for instance, he could have put PETE in</p> <p>14 this blank for use of the promo code?</p> <p>15 A. I guess anything is possible. I don't recall</p> <p>16 doing it or using it.</p> <p>17 Q. Okay. And do you know if any promo codes were</p> <p>18 used to generate sales of MyPillow for commercials like</p> <p>19 this for the Cyber Symposium?</p> <p>20 A. I don't remember that.</p> <p>21 Q. Okay. Did you create any promo codes for use</p> <p>22 in commercials like this for the Cyber Symposium?</p> <p>23 A. I don't recall that, either.</p> <p>24 Q. Okay. I'm going to mark another document</p> <p>25 that's a spiral-bound, Ms. Curtis. It's going to be</p>
<p style="text-align: right;">Page 306</p> <p>1 Q. Okay. And then, below there, do you see it's</p> <p>2 got some text or some language that appears to be a video,</p> <p>3 and then, below the language says, "Hello. I'm</p> <p>4 Mike Lindell. I'm coming to you with the most important</p> <p>5 commercial I've ever done. All of you know what MyPillow</p> <p>6 and myself have gone through in the last five months in an</p> <p>7 effort to bring the truth forward. Well, it's all come</p> <p>8 down to this:</p> <p>9 I'm having a Cyber Symposium on August 10, 11</p> <p>10 and 12. The historical event will be live-streamed</p> <p>11 72 hours straight on my new platform frankspeech.com. You</p> <p>12 can help by getting everybody you know to go to</p> <p>13 frankspeech.com now."</p> <p>14 Do you see that?</p> <p>15 A. Yes.</p> <p>16 Q. And then, the promo code is blank, and if you</p> <p>17 look at the text message on that last page, page 145,</p> <p>18 after you send that, Mike Lindell says, "Correct. They</p> <p>19 can use any promo code."</p> <p>20 And that's in response to, sort of, a part of</p> <p>21 the text that you had sent saying, "Hi, on your new video</p> <p>22 you did, you mentioned 'use the promo code on the screen,'</p> <p>23 but there is not a promo code listed. I wasn't sure if</p> <p>24 this was supposed to be added."</p> <p>25 Do you see that?</p>	<p style="text-align: right;">Page 308</p> <p>1 Exhibit 456, and it's another text chain. And this text</p> <p>2 actually, when we look at the dates, it appears kind of</p> <p>3 like right after the one from Exhibit 437. It's the way</p> <p>4 it was produced.</p> <p>5 (Whereupon, Exhibit 456 was marked.)</p> <p>6 BY MS. WRIGLEY:</p> <p>7 Q. Handing to you Exhibit 456. It's Bates</p> <p>8 Stamped 121015. This one's got 186 pages.</p> <p>9 Do you see that at the top, your name and your</p> <p>10 phone number?</p> <p>11 A. Yes.</p> <p>12 Q. And then, do you see that -- do you recognize</p> <p>13 Mike Lindell's name and phone number at the top?</p> <p>14 A. Yes.</p> <p>15 Q. And these are texts between the two of you?</p> <p>16 A. Yes.</p> <p>17 Q. And the text chain starts at July 28, 2021,</p> <p>18 and the first text from you is at 6:39 p.m.</p> <p>19 Do you see that?</p> <p>20 A. Yes.</p> <p>21 Q. And this comes right after, if you would look</p> <p>22 at the last page of the text chain in Exhibit 437, that</p> <p>23 one ends on July 28, 2021 at 6:39 p.m.</p> <p>24 Do you see that?</p> <p>25 A. Yes.</p>

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<p style="text-align: right;">Page 309</p> <p>1 Q. Okay. And this one, if you go all the way to</p> <p>2 the end, covers the time period up through May 9, 2022?</p> <p>3 A. Yes.</p> <p>4 Q. Got it. Okay.</p> <p>5 I'm going to ask you -- I'm going to show you,</p> <p>6 actually, a video. My colleague is going to come around.</p> <p>7 This is going to be Exhibit 457.</p> <p>8 This is a video file that was an attachment</p> <p>9 produced in connection with this text chain. The video,</p> <p>10 for the record, has a Bates Stamp DEF121020, and it goes</p> <p>11 with the attachment that appears in the second box from</p> <p>12 the top on page 10 of Exhibit 456.</p> <p>13 (Whereupon, Exhibit 457 was marked.)</p> <p>14 MS. WRIGLEY: Go ahead and play it.</p> <p>15 (Video Played:</p> <p>16 MIKE LINDELL: "Hello. I'm Mike Lindell, and</p> <p>17 I'm coming to you with the most important commercial that</p> <p>18 I've ever done. All of you know what MyPillow and myself</p> <p>19 have gone through in the last five months in my efforts to</p> <p>20 bring the truth forward. Well, it's all come down to</p> <p>21 this.</p> <p>22 I'm having a Cyber Symposium on August 10, 11</p> <p>23 and 12. This historical event will be live-streamed 72</p> <p>24 hours straight on my new platform frankspeech.com. You</p> <p>25 can help by getting everybody you know to go to</p>	<p style="text-align: right;">Page 311</p> <p>1 was used by other sort of radio, media or influencers for</p> <p>2 the Cyber Symposium where they could have used the</p> <p>3 promo code associated with their own organization?</p> <p>4 A. I don't know how all these promo codes got</p> <p>5 tagged with that commercial. I'm not aware.</p> <p>6 Q. Okay. I'm going to, sort of, mark just for</p> <p>7 the record Exhibit 458.</p> <p>8 (Whereupon, Exhibit 458 was marked.)</p> <p>9 BY MS. WRIGLEY:</p> <p>10 Q. I'll represent to you these are, sort of,</p> <p>11 screenshots taken from the video file that we just watched</p> <p>12 in Exhibit 457, and you can see on the second page, it's</p> <p>13 got the use of the promo code LANCE.</p> <p>14 Do you see that?</p> <p>15 A. I do.</p> <p>16 Q. Okay. And would you have been the one in</p> <p>17 terms of, like, this LANCE promo code or any other</p> <p>18 promo codes used in connection with any Cyber Symposium</p> <p>19 commercials? Would you have been the one to set up those</p> <p>20 codes within the MyPillow system?</p> <p>21 A. I set up the promo code. Lance Wallnau has</p> <p>22 been advertising MyPillow products. I don't know when he</p> <p>23 started that.</p> <p>24 Q. Okay. Okay.</p> <p>25 Would you have access to files that contain</p>
<p style="text-align: right;">Page 310</p> <p>1 frankspeech.com now.</p> <p>2 To help support the Cyber Symposium event, I</p> <p>3 am offering some of the best prices ever on MyPillow</p> <p>4 products, but they're only offered at frankspeech.com. Go</p> <p>5 to frankspeech.com now and use the promo code on your</p> <p>6 screen or call the 1-800 number below to receive these</p> <p>7 exclusive MyPillow offers.</p> <p>8 Thank you, and God bless." (Video stopped.)</p> <p>9 BY MS. WRIGLEY:</p> <p>10 Q. Are you familiar with that commercial for the</p> <p>11 Cyber Symposium?</p> <p>12 A. Yes.</p> <p>13 Q. Okay. And did you see a reference to use of a</p> <p>14 promo code to be used on the MyPillow website?</p> <p>15 A. Yes.</p> <p>16 Q. And I think it appeared on the screen. The</p> <p>17 code was LANCE.</p> <p>18 Did you see that?</p> <p>19 A. I did.</p> <p>20 Q. Do you know what the reference to LANCE is to?</p> <p>21 A. Lance Wallnau.</p> <p>22 Q. Who is that?</p> <p>23 A. I believe Mike's -- he's a minister of some</p> <p>24 sort.</p> <p>25 Q. Okay. And do you know whether that commercial</p>	<p style="text-align: right;">Page 312</p> <p>1 commercials like these prepared by Mike Lindell for the</p> <p>2 Cyber Symposium at MyPillow?</p> <p>3 A. I do not have access.</p> <p>4 Q. Okay. Do you know where he creates these?</p> <p>5 A. I do not.</p> <p>6 Q. Okay. Do you know who helps him create these</p> <p>7 commercials or videos?</p> <p>8 A. I do not.</p> <p>9 Q. Okay. If I go back to the new text chain that</p> <p>10 we looked at, 456, you had, sort of, attached that file --</p> <p>11 this is on page 10, the last one. And actually, there was</p> <p>12 a similar one with audio you attached before then on, sort</p> <p>13 of, the previous page, at the top, page 9, there was</p> <p>14 another audio attachment, Frank Stew.</p> <p>15 Where would you have gotten these files to</p> <p>16 attach in the text to Mr. Lindell?</p> <p>17 A. Possibly our IT department. I don't know for</p> <p>18 sure.</p> <p>19 Q. Okay. And then, why would you have been</p> <p>20 sending them to Mr. Lindell at this time?</p> <p>21 A. I don't recall sending them to Mike. I don't</p> <p>22 know.</p> <p>23 Q. Okay. Okay. And then, back to the</p> <p>24 Cyber Symposium, did you have any responsibilities</p> <p>25 regarding advertising for the Cyber Symposium beyond, sort</p>

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<p style="text-align: right;">Page 313</p> <p>1 of, commercials like these?</p> <p>2 A. No.</p> <p>3 Q. Okay. Do you know if any -- well, strike</p> <p>4 that. I'm going to show you an exhibit.</p> <p>5 (Whereupon, Exhibit 102 was introduced.)</p> <p>6 BY MS. WRIGLEY:</p> <p>7 Q. Ms. Curtis, I'm handing to you what's been</p> <p>8 previously marked Exhibit 102 in this email chain. And I</p> <p>9 direct your attention to the email that's at the bottom in</p> <p>10 the chain. It starts on the second page.</p> <p>11 Do you see an email from Joey Dalessio?</p> <p>12 A. Yes.</p> <p>13 Q. She sends it on July 30, 2021 to Daria at</p> <p>14 Infowars and yourself at MyPillow and copies other people</p> <p>15 with Infowars email addresses; correct?</p> <p>16 A. Yes.</p> <p>17 Q. And she sends this email, I think it's in in</p> <p>18 response to an email prior to that from Daria at Infowars</p> <p>19 earlier that day on July 30, 2021; correct?</p> <p>20 A. It looks like it, yes.</p> <p>21 Q. Okay. And the first email from Daria writes,</p> <p>22 "MyPillow is pulling a Fox ad to run with us instead.</p> <p>23 Don't have the ad yet. It's being sent by our people to</p> <p>24 Joey. Joey will send the ad here as soon as he gets it.</p> <p>25 Alex wants to run the ad as soon as possible. The ad is</p>	<p style="text-align: right;">Page 315</p> <p>1 A. That's correct.</p> <p>2 Q. And they had their own code ALEX?</p> <p>3 A. Correct.</p> <p>4 Q. Okay. And is ALEX one of the codes or, sort</p> <p>5 of, organizations that I think you mentioned earlier was a</p> <p>6 top performer?</p> <p>7 A. At times, he is.</p> <p>8 Q. At times. All right.</p> <p>9 Ms. Joey Dalessio writes to you, "Dawn, this</p> <p>10 email thread contains the entire team ensembled on our end</p> <p>11 to ensure the ad is handled properly and in a timely</p> <p>12 manner for widest dissemination. Please use this thread</p> <p>13 and reply all with the ad once it is ready. This will</p> <p>14 ensure this effort is seamless.</p> <p>15 Additionally, if there are any folks on your</p> <p>16 end from a technical standpoint that you feel should be</p> <p>17 added, please do so. Thanks again, and we will ensure</p> <p>18 success on our end. Daria, Dawn is my POC at MyPillow."</p> <p>19 Do you see that?</p> <p>20 A. Yes.</p> <p>21 Q. Okay. And at this point in time, would you</p> <p>22 have been the point of contact for the ad promoting the</p> <p>23 MyPillow Election Fraud symposium?</p> <p>24 MS. OLIVER: Objection to form.</p> <p>25 You may answer.</p>
<p style="text-align: right;">Page 314</p> <p>1 promoting the MyPillow Election Fraud Symposium and is</p> <p>2 very important as it has our promo code on it, ALEX.</p> <p>3 The ad needs to be turned into an audio ad and</p> <p>4 a video ad. The ad needs to be added to all our longer</p> <p>5 videos from the shows in the middle or at the end. The ad</p> <p>6 needs to be run on our network video feeds. Alex wants</p> <p>7 the ad ready by 11:30 for the show, which Alex will be</p> <p>8 co-hosting, and he will air it then, also. This ad needs</p> <p>9 maximum push."</p> <p>10 Do you see this?</p> <p>11 A. I see that.</p> <p>12 Q. Okay. And who's Daria at Infowars?</p> <p>13 A. To be honest, I'm not sure.</p> <p>14 Q. Okay. And then Joey Dalessio responds,</p> <p>15 "Correct," and he sends an email addressing you?</p> <p>16 A. Yes.</p> <p>17 Q. Who is Joey Dalessio?</p> <p>18 A. My old rep for Alex Jones.</p> <p>19 Q. Okay. And is that somebody that you</p> <p>20 communicated with in connection with MyPillow marketing or</p> <p>21 advertising?</p> <p>22 A. Yes, I send him the sales every Monday.</p> <p>23 Q. Got it.</p> <p>24 And at this point in time, Infowars was doing</p> <p>25 marketing or advertising for MyPillow products?</p>	<p style="text-align: right;">Page 316</p> <p>1 A. I am the contact at MyPillow advertising for</p> <p>2 Alex Jones.</p> <p>3 BY MS. WRIGLEY:</p> <p>4 Q. Okay. And would you have been the contact for</p> <p>5 this ad that they're referring to in this email that</p> <p>6 promotes the MyPillow election fraud symposium?</p> <p>7 A. I sent off an email. It looks like it came</p> <p>8 from jpaulie@mypillow.com.</p> <p>9 Q. Okay. So you responded with some files; is</p> <p>10 that right, to the individual at Infowars?</p> <p>11 A. It looks that way, yes.</p> <p>12 Q. Okay. And then you included some additional</p> <p>13 files; is that correct?</p> <p>14 A. I don't know what files they were.</p> <p>15 Q. Okay. And did this ad promoting the MyPillow</p> <p>16 election fraud symposium with the promo code ALEX, did it,</p> <p>17 in fact, get run after this email?</p> <p>18 A. I have No idea.</p> <p>19 Q. Would there be a way to find out?</p> <p>20 A. I don't know.</p> <p>21 Q. Okay. I want to have you go back to the new</p> <p>22 text message that we looked at, which is Exhibit 456, and</p> <p>23 I'm going to have you go to the second page, which I think</p> <p>24 has a text of July 30th, 2021, and then I will -- do you</p> <p>25 see kind of like above that date, there's -- in your</p>

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<p style="text-align: right;">Page 317</p> <p>1 report, Alex Jones appears?</p> <p>2 A. Yes.</p> <p>3 Q. Okay. And it looks like, on the 29th or the</p> <p>4 day before at 12:37 p.m., you reported his daily sales of</p> <p>5 \$29,200.</p> <p>6 Do you see that?</p> <p>7 A. Yes.</p> <p>8 Q. Okay. Now, on 7/30/2021, Lindell texts you,</p> <p>9 "Please call me 7:30 your time. Over." He says, "I would</p> <p>10 like to go in Gallagher and talk about dropping Fox."</p> <p>11 Do you see that?</p> <p>12 A. Yes.</p> <p>13 Q. Okay. And then, you texted back with a report</p> <p>14 of some numbers; correct?</p> <p>15 A. Yes.</p> <p>16 Q. And then, Alex Jones appears there with</p> <p>17 \$20,400 -- \$20,400 for the day; correct?</p> <p>18 A. Yes.</p> <p>19 Q. And then, if I go forward onto page 5,</p> <p>20 July 31st, 2021, you get another report, and Alex Jones</p> <p>21 appears -- or Alex appears there with \$53,090 for the day;</p> <p>22 correct?</p> <p>23 A. Yes.</p> <p>24 Q. And at the top, you write, "Yesterday's sales</p> <p>25 were really good. These are actual sales."</p>	<p style="text-align: right;">Page 319</p> <p>1 Do you see that Alex Jones has got \$193,400</p> <p>2 with a week prior of \$176,500?</p> <p>3 A. Yes.</p> <p>4 Q. Okay. And then, on that same day, which is</p> <p>5 August 9, 2021, that's the day before the Cyber Symposium;</p> <p>6 correct?</p> <p>7 A. If that's what it was.</p> <p>8 Q. Okay. And do you see that the first one you</p> <p>9 have listed there is L66?</p> <p>10 Do you see that?</p> <p>11 A. Yes.</p> <p>12 Q. What's L66 associated with?</p> <p>13 A. A promo code that Mike had set up for a long</p> <p>14 time. I don't know what it's associated with.</p> <p>15 Q. Okay. And that's sort of over \$353,000 for</p> <p>16 the week; correct?</p> <p>17 A. Yes.</p> <p>18 Q. The next one is Frank.</p> <p>19 Do you see that?</p> <p>20 A. Yes.</p> <p>21 Q. And that one is \$390,000 for the week;</p> <p>22 correct?</p> <p>23 A. Correct.</p> <p>24 Q. And then War Room is next; correct?</p> <p>25 A. Yes.</p>
<p style="text-align: right;">Page 318</p> <p>1 Do you see that?</p> <p>2 A. Yes.</p> <p>3 Q. Okay. And if I go forward to page 6 at 8/2/21</p> <p>4 when you report the numbers, Alex Jones appears again;</p> <p>5 correct?</p> <p>6 A. Correct.</p> <p>7 Q. And Alex Jones, at this point, has got</p> <p>8 \$176,500.</p> <p>9 Do you see that?</p> <p>10 A. For the week prior, yes.</p> <p>11 Q. Okay. Well, he has 106,7 -- 500.</p> <p>12 Is that for the day or week?</p> <p>13 A. That's for the week.</p> <p>14 Q. And then, the week prior is \$338,800?</p> <p>15 A. That's correct.</p> <p>16 Q. Okay. And then, if I go over to page 7 at</p> <p>17 8/3/21, you're again reporting numbers, and Alex Jones is</p> <p>18 there, as well; correct?</p> <p>19 A. That's correct.</p> <p>20 Q. And the daily numbers are \$25,400; correct?</p> <p>21 A. Yes.</p> <p>22 Q. And then, if I skip forward, go forward a</p> <p>23 couple texts or a couple days to page 12, I'm looking at a</p> <p>24 text from August 9, 2021 when you're reporting weekly</p> <p>25 numbers.</p>	<p style="text-align: right;">Page 320</p> <p>1 Q. The War Room is \$407,900; correct?</p> <p>2 A. Yes.</p> <p>3 Q. And the week prior for War Room was over -- or</p> <p>4 it was \$509,000; correct?</p> <p>5 A. Correct.</p> <p>6 Q. Okay. And then, if I go forward to</p> <p>7 August 10th, 2021 on page 13, you wrote, "Report daily</p> <p>8 numbers that include L66, Frank, War Room, Diamond & Silk,</p> <p>9 Newsmax, OAN, Bards, Chicks, Bongino, Stew, Alex Jones,</p> <p>10 Gallagher, Dinesh -- am I saying that right?</p> <p>11 A. Dinesh --</p> <p>12 Q. -- Dinesh, Hannity, Beck, RSBN; correct?</p> <p>13 A. Correct.</p> <p>14 Q. And you have a note, "Sales are incredible</p> <p>15 today"; correct?</p> <p>16 A. Correct.</p> <p>17 Q. And you include an attachment; right?</p> <p>18 A. It looks like it, yes.</p> <p>19 Q. Okay. And then these file names when you</p> <p>20 attach it, it's got like a dot-HEIC.</p> <p>21 What are those attachments you're sending</p> <p>22 them?</p> <p>23 A. I don't know what that is.</p> <p>24 Q. Okay. And then this August 10th, 2021, that's</p> <p>25 the day of the Cyber Symposium; correct?</p>

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<p style="text-align: right;">Page 321</p> <p>1 A. If that's what it states.</p> <p>2 Q. Okay. I'm going to hand to you Exhibit 460 --</p> <p>3 actually, Exhibit 459.</p> <p>4 (Whereupon, Exhibit 459 was marked.)</p> <p>5 BY MS. WRIGLEY:</p> <p>6 Q. It's Bates Stamped 121959.</p> <p>7 Do you see this is as an email from Joe Cox to</p> <p>8 Mike Lindell on August 4th, 2021 that he, then, forwards</p> <p>9 to you on August 5th 2021?</p> <p>10 A. Yes.</p> <p>11 Q. The email from Joe Cox has the subject line</p> <p>12 "Cyber Symposium Billboard Art."</p> <p>13 Do you see that?</p> <p>14 A. I see that.</p> <p>15 Q. And then, there's an attachment which has got,</p> <p>16 sort of, graphic that says, "Help Save Our Country,</p> <p>17 Mike Lindell Cyber Symposium, August 10-12,</p> <p>18 frankspeech.com."</p> <p>19 Do you see that?</p> <p>20 A. Yes.</p> <p>21 Q. And Mr. Lindell forwards this Cyber Symposium</p> <p>22 billboard art to you; correct?</p> <p>23 A. That's what it looks like.</p> <p>24 Q. And do you have any understanding of, at the</p> <p>25 time, why Mr. Lindell sent you this Cyber Symposium</p>	<p style="text-align: right;">Page 323</p> <p>1 Do you see that?</p> <p>2 A. Yes.</p> <p>3 Q. Would you have been sending Mr. Santilli an</p> <p>4 invoice?</p> <p>5 A. It looks like he was sending me an invoice for</p> <p>6 his MyPillow sales.</p> <p>7 Q. Okay. And he writes, "Dawn, is it easier for</p> <p>8 you guys to do an ACH payment to R. Santilli & Associates,</p> <p>9 LLC account? I can provide account and routing number or</p> <p>10 wire transfer. Whichever is easiest for your accounting</p> <p>11 department. My accountant has requested I change our</p> <p>12 invoicing to go to our business account so if you could</p> <p>13 help direct me to the right person, I would like to get</p> <p>14 that set up."</p> <p>15 Do you see that?</p> <p>16 A. Yes.</p> <p>17 Q. And invoice attached regarding month and</p> <p>18 numbers, does this communication have to do with</p> <p>19 Mr. Santilli getting paid for any of MyPillow sales that</p> <p>20 were generated in connection with his promo code?</p> <p>21 A. For yeah, MyPillow products.</p> <p>22 Q. Okay. Okay.</p> <p>23 And you'd be communicating with him about,</p> <p>24 sort of, the numbers and then just payment being made?</p> <p>25 A. Correct.</p>
<p style="text-align: right;">Page 322</p> <p>1 billboard art?</p> <p>2 A. No.</p> <p>3 Q. Did you do anything with this billboard art?</p> <p>4 A. I don't recall doing anything.</p> <p>5 Q. Okay. We can put that to the side.</p> <p>6 (Whereupon, Exhibit 54 was introduced.)</p> <p>7 BY MS. WRIGLEY:</p> <p>8 Q. I'm going to hand to you what's been marked as</p> <p>9 Exhibit 54. This is an email chain from July 2021;</p> <p>10 correct?</p> <p>11 A. Yes.</p> <p>12 Q. I'm going to walk through the email chain,</p> <p>13 start with the back.</p> <p>14 The first email on this chain starts on the</p> <p>15 fourth page. It's on July 16, 2021 at 7:07 a.m., I think,</p> <p>16 from yourself.</p> <p>17 And do you see you write, and then, there's a</p> <p>18 reference to Pete Santilli with a file?</p> <p>19 A. Yes.</p> <p>20 Q. And Mr. Santilli writes back to you on</p> <p>21 July 16.</p> <p>22 Do you see that?</p> <p>23 A. Yes.</p> <p>24 Q. The subject is, "Invoice Attached RE: Month</p> <p>25 and Numbers."</p>	<p style="text-align: right;">Page 324</p> <p>1 Q. And then, you responded, "Hi Pete." This is</p> <p>2 on page 3, "I think our accounting prefers checks, but all</p> <p>3 I would need if we were issuing a check to a new company</p> <p>4 is a new W-9 stating that."</p> <p>5 Do you see that?</p> <p>6 A. Yes.</p> <p>7 Q. And then, Mr. Santilli responds.</p> <p>8 Do you see that?</p> <p>9 A. Yes.</p> <p>10 Q. This is on page 2.</p> <p>11 He also indicates or mentions whether there's</p> <p>12 a possibility of getting a media credential to cover the</p> <p>13 Cyber Symposium.</p> <p>14 Do you see that?</p> <p>15 A. Yes.</p> <p>16 Q. And then, he also, sort of, talks about</p> <p>17 putting in a request, and copying Katelyn, assuming she's</p> <p>18 the one courting the media.</p> <p>19 Do you see that?</p> <p>20 A. That is correct.</p> <p>21 Q. And then, Katelyn or Ms. Gamlin sends him a</p> <p>22 request to attend the Cyber Symposium on the 10th, 11th</p> <p>23 and 12th.</p> <p>24 Do you see that?</p> <p>25 A. Yes.</p>

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<p style="text-align: right;">Page 325</p> <p>1 Q. Okay. And then, Mr. Santilli responds, and</p> <p>2 you're still copied on that email, and that's July 28th,</p> <p>3 2021; correct?</p> <p>4 A. Yes.</p> <p>5 Q. Okay. And was Ms. Gamlin, sort of,</p> <p>6 responsible for coordinating media attendance at the</p> <p>7 Cyber Symposium?</p> <p>8 MS. OLIVER: Objection to form.</p> <p>9 You can answer.</p> <p>10 A. I don't know. You'd have to ask her.</p> <p>11 BY MS. WRIGLEY:</p> <p>12 Q. Okay. Did you have any role in coordinating</p> <p>13 media attendance for any of the radio, podcasts or</p> <p>14 influencers that you worked with for attendance at the</p> <p>15 Cyber Symposium in August of 2021?</p> <p>16 A. No.</p> <p>17 Q. Okay. Do you know whether Mr. Santilli</p> <p>18 attended the Cyber Symposium?</p> <p>19 A. I don't know.</p> <p>20 Q. Do you know whether Mr. Santilli promoted the</p> <p>21 Cyber Symposium on his store?</p> <p>22 A. I don't know if he did.</p> <p>23 Q. Or show? I'm sorry.</p> <p>24 A. I don't know if he did.</p> <p>25 Q. Okay.</p>	<p style="text-align: right;">Page 327</p> <p>1 Dawn, please have Terri or Katelyn take care of her."</p> <p>2 Do you see that?</p> <p>3 A. Yes.</p> <p>4 Q. And then, you forwarded this email to</p> <p>5 terripietz@mypillow.com.</p> <p>6 Do you see that?</p> <p>7 A. Yes.</p> <p>8 Q. You said, "Hi Terri. Lisa Michaels will need</p> <p>9 info for the Cyber Symposium."</p> <p>10 Do you see that?</p> <p>11 A. Yes.</p> <p>12 Q. And who is Terri?</p> <p>13 A. Terri Pietz is a MyPillow employee.</p> <p>14 Q. And did you -- why did you forward this</p> <p>15 information to Terri?</p> <p>16 A. Because Mike requested me to.</p> <p>17 Q. And this was to help coordinate Lisa Michaels</p> <p>18 at Bott Radio Network to get invited or attend the</p> <p>19 symposium; is that right?</p> <p>20 A. That's correct.</p> <p>21 Q. Okay. I'm going to show you another document</p> <p>22 related to Lisa Michaels. 461.</p> <p>23 (Whereupon, Exhibit 461 was marked.)</p> <p>24 BY MS. WRIGLEY:</p> <p>25 Q. It's printed out a little bit weird. It's</p>
<p style="text-align: right;">Page 326</p> <p>1 (Whereupon, Exhibit 460 was marked.)</p> <p>2 BY MS. WRIGLEY:</p> <p>3 Q. Handing you what's been marked Exhibit 460,</p> <p>4 Bates Number DEF023583.</p> <p>5 Do you see this is an email chain from</p> <p>6 August 3rd, 2021 between you and Lisa Michaels at Bott</p> <p>7 Radio Network?</p> <p>8 A. Yes.</p> <p>9 Q. Who is Lisa Michaels at Bott Radio Network?</p> <p>10 A. She advertised MyPillow.</p> <p>11 Q. At the bottom of the chain, she wrote you and</p> <p>12 Mr. Lindell saying, "Hi Mike and Dawn. What a great news</p> <p>13 story to say Mike Lindell moved his ad dollars from</p> <p>14 Fox News to Christian News Talk, Bott Radio Network to</p> <p>15 promote his Election Integrity Symposium. Of course, we</p> <p>16 would also remind our Christian conservative listeners</p> <p>17 that they can still use the Promo Code BOTT to receive</p> <p>18 amazing discounts on all of the fine MyPillow products."</p> <p>19 Do you see that?</p> <p>20 A. Yes.</p> <p>21 Q. Okay. And then, Mr. Lindell responded to her</p> <p>22 that day, and you were copied; correct?</p> <p>23 Do you see that? It's on the first page.</p> <p>24 A. Yes.</p> <p>25 Q. He says, "Hey Lisa, for sure you're invited.</p>	<p style="text-align: right;">Page 328</p> <p>1 Exhibit 461, Bates stamped 024937, and it's got an</p> <p>2 attachment --</p> <p>3 THE REPORTER: 0249 what?</p> <p>4 BY MS. WRIGLEY:</p> <p>5 Q. The attachment is 02938.</p> <p>6 If you look at the email, do you see it's an</p> <p>7 email chain between Lisa Michaels, yourself and</p> <p>8 Mike Lindell from August 18th, and August 20, 2021?</p> <p>9 A. Yes.</p> <p>10 Q. Okay. On August 18th, do you see she writes</p> <p>11 to Mike Lindell copying you, "Subject: Many thanks for</p> <p>12 all that you are doing to fight for election integrity."</p> <p>13 She states, "Hi Mike and Dawn. First of all, many thanks</p> <p>14 for sharing your historic Election Integrity Cyber</p> <p>15 Symposium with our listeners by purchasing a week's worth</p> <p>16 of ads on all 120 Christian news talk radio stations as</p> <p>17 well as streaming around the world on several platforms.</p> <p>18 I pray our listeners responded generously by purchasing MP</p> <p>19 products using promo code BOTT."</p> <p>20 Do you see that?</p> <p>21 A. Yes.</p> <p>22 Q. Okay. And then, she sort of continues her</p> <p>23 email, then you responded to her email on the 20th;</p> <p>24 correct?</p> <p>25 A. Yes.</p>

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<p style="text-align: right;">Page 329</p> <p>1 Q. And you stated, "Good morning, Lisa. I have 2 attached sales from the symposium spots that you ran for 3 that week. It brought in about \$2,200 in sales, far below 4 the ROI we needed to get to. I'm not going to continue 5 running more spots at this time, but maybe we can look at 6 this again in a few months. I know you really enjoyed the 7 symposium and what Mike revealed, and it sounds like you 8 have much to add to the election fraud. 9 Going forward, I would hope that when 10 discussing potential running spots, you just send 11 correspondences to me and not have to include Mike on 12 emails. He's extremely busy and has put me in the 13 position to make these decisions. Please know that I run 14 all these by Mike anyways, and he will make the final 15 decision." 16 Do you see that? 17 A. Yes. 18 Q. And you attached to your email the sales. 19 Do you see this? 20 A. I do. 21 Q. And then, would you have, kind of, created 22 this report -- this sales report attached to the email? 23 A. Yes. 24 Q. And walk me through what the sales report. 25 A. Annaware our calls into our call center.</p>	<p style="text-align: right;">Page 331</p> <p>1 A. As long as they're one of my advertisers, yes. 2 Q. Got it. 3 And then, if I look at that second page of the 4 attachment, this is just a similar report, but it gives a 5 number of different more weeks for the promo code use; 6 right? 7 A. Correct. 8 Q. Okay. And was she using this BOTT promo code 9 in connection with advertising the Cyber Symposium? 10 A. She was supposed to use it as promoting 11 MyPillow products. I'm not quite sure why she -- how 12 she -- how she was promoting it. That's why we didn't do 13 anything this year with her. 14 Q. Okay. Okay. 15 Did MyPillow have any -- get any promotion or 16 advertising in connection with any commercials for the 17 Cyber Symposium that were put up online? 18 MS. OLIVER: Objection to form. 19 You can answer. 20 A. I don't know. 21 BY MS. WRIGLEY: 22 Q. Do you have any responsibility for commercials 23 that get posted on Facebook? 24 A. No. 25 Q. Who has that responsibility at MyPillow?</p>
<p style="text-align: right;">Page 330</p> <p>1 THE REPORTER: I'm sorry? 2 A. Annaware, our sales into our call center; 3 Magento, our web's quarters, and then the total revenue is 4 the next column. 5 BY MS. WRIGLEY: 6 Q. And you were able to pull this information for 7 a specific week or period of time and the Promo Code BOTT; 8 correct? 9 A. Correct. 10 Q. And then, you also have a cash buy number 11 here, if that makes sense? 12 A. Correct. 13 Q. And I think in terms of your email, does this 14 reflect that the ROI, in terms of the sales brought in by 15 Lisa Michaels had bought was not worth it based on the 16 cash buy? 17 A. Right. 18 Q. Okay. And then, is this similar to the 19 sales report that you send other radio, podcaster, 20 influencers on a regular basis to identify the sales 21 generated? 22 A. Yes. 23 Q. Okay. And you're able to do it for a 24 particular point in time with the revenue code and then 25 numbers from Annaware and Magento?</p>	<p style="text-align: right;">Page 332</p> <p>1 A. Heidi O'Donnell. 2 Q. Heidi O'Donnell. 3 What's her position at the company? 4 A. Social media. 5 Q. Social media. 6 And in terms of commercials or ads that run on 7 Facebook, would she be the person with the most knowledge? 8 A. I would imagine, yes. 9 Q. If those commercials or ads that are used 10 online make use of promo codes, would you have access to 11 information about the performance of the promo codes? 12 A. She would have that. 13 Q. Okay. Would you have any responsibilities 14 with respect to a promo code that's used on a -- on an ad 15 or commercial that gets posted on Facebook? 16 A. No. 17 Q. Okay. What if there was a -- sort of a 18 commercial for the Cyber Symposium that was posted on 19 Facebook that had, like, a Frank promo code number? 20 A. Once again, I have nothing to do with any 21 social media. Nothing. 22 Q. Okay. Would she have her own set of revenue 23 for promo codes generated through online advertisements? 24 MS. OLIVER: Objection to form. 25 You can answer.</p>

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<p style="text-align: right;">Page 333</p> <p>1 A. You would have to ask her. I don't know.</p> <p>2 BY MS. WRIGLEY:</p> <p>3 Q. Okay. So if you go into Annaware or the</p> <p>4 system, can you tell the performance of promo codes</p> <p>5 associated with online or social media commercials for</p> <p>6 MyPillow?</p> <p>7 A. I don't know what kind of commercials. We</p> <p>8 have Facebook ads.</p> <p>9 Q. Okay. Okay.</p> <p>10 While we're waiting for the exhibits, I've</p> <p>11 seen a number of promo codes that have the term "audit" at</p> <p>12 the beginning.</p> <p>13 Are there AUDIT promo codes used at MyPillow?</p> <p>14 A. I don't know. I use one. It's a podcast</p> <p>15 called, "Out of the Vote."</p> <p>16 That's the only one I know of.</p> <p>17 Q. And is it "AUDIT"?</p> <p>18 A. I believe so.</p> <p>19 Q. Okay. And then, how many numbers are</p> <p>20 associated with that one?</p> <p>21 A. I don't know.</p> <p>22 Q. Are there any other AUDIT promo codes that</p> <p>23 generate MyPillow sales besides the one you just</p> <p>24 mentioned?</p> <p>25 A. I don't know. I don't recall.</p>	<p style="text-align: right;">Page 335</p> <p>1 tracking or monitoring the promotion -- the promo codes</p> <p>2 used on any commercials like this?</p> <p>3 A. Not unless Mike asked for a specific</p> <p>4 promo code at the time.</p> <p>5 Q. Okay. If you look at the next one that's</p> <p>6 marked 363, again, this is from the iSpot TV website that</p> <p>7 archives or houses online advertisements or commercials.</p> <p>8 This one has a title, "FrankSpeech TV spot help in a</p> <p>9 couple ways. The publication date, according to iSpot TV,</p> <p>10 is August 26, 2021, and the promotion is called, 'MyPillow</p> <p>11 Flash Sale on FrankSpeech.' The description states,</p> <p>12 'Mike Lindell of MyPillow presents his new platform</p> <p>13 FrankSpeech and offers discounts via the FrankSpeech site</p> <p>14 only'."</p> <p>15 Do you see that?</p> <p>16 A. Yes.</p> <p>17 Q. And once again, have you seen a commercial</p> <p>18 like this put online to promote FrankSpeech?</p> <p>19 A. I haven't seen it personally online. I've</p> <p>20 seen this commercial, yes.</p> <p>21 Q. You've seen this commercial? Okay.</p> <p>22 And do you see at the bottom, with the sort of</p> <p>23 screenshot attached here that they got MyPillow flash</p> <p>24 sale, and then, over to the right, the image has, "Use of</p> <p>25 promo code," and it says, "FRANK10."</p>
<p style="text-align: right;">Page 334</p> <p>1 Q. Have you ever set up any AUDIT promo codes for</p> <p>2 MyPillow sales?</p> <p>3 A. I don't recall that, either.</p> <p>4 (Whereupon, Exhibit 462 was marked.)</p> <p>5 (Whereupon, Exhibit 463 was marked.)</p> <p>6 BY MS. WRIGLEY:</p> <p>7 Q. I'm going to hand to you two exhibits. The</p> <p>8 first one is 462, the second one is marked 463. These</p> <p>9 are -- these are screenshots taken from a website called</p> <p>10 iSpot that archives or houses online advertisements or</p> <p>11 commercials.</p> <p>12 The first one that's marked 462 is for</p> <p>13 FrankSpeech, and it has a promotion for the</p> <p>14 Cyber Symposium and a MyPillow sale. It was published,</p> <p>15 according to the iSpot TV website, on August 8th, 2021,</p> <p>16 and you can see a description that they give on iSpot.</p> <p>17 The description states, "Mike Lindell of MyPillow promotes</p> <p>18 his recent platform FrankSpeech in a Cyber Symposium event</p> <p>19 that he says he's supporting by offering deals on MyPillow</p> <p>20 products on the FrankSpeech site only."</p> <p>21 Do you see that?</p> <p>22 A. Yes.</p> <p>23 Q. Are you familiar with commercials like this?</p> <p>24 A. I've seen a commercial like this, yes.</p> <p>25 Q. Okay. Would you have any responsibility for</p>	<p style="text-align: right;">Page 336</p> <p>1 Do you see that?</p> <p>2 A. Okay.</p> <p>3 Q. And I think, earlier in your testimony, you</p> <p>4 indicated that there were -- there's a promo code FRANK,</p> <p>5 and then they went up from 1 to almost 1,000 in terms of</p> <p>6 numbers?</p> <p>7 A. It's possible, yes.</p> <p>8 Q. Okay. And would sales generated from the use</p> <p>9 of this FRANK10 promo code and advertisement like this be</p> <p>10 information that you have access to and track regularly in</p> <p>11 terms of performance of promo codes?</p> <p>12 A. I would imagine, yeah.</p> <p>13 Q. Yes, okay.</p> <p>14 (Whereupon, Exhibit 464 was marked.)</p> <p>15 BY MS. WRIGLEY:</p> <p>16 Q. And just for the record, I'm going to mark</p> <p>17 each of the videos. The first one that goes with the</p> <p>18 FrankSpeech TV spot Cyber Symposium that I marked as 462,</p> <p>19 there's a video that goes with it, I'm marking as</p> <p>20 Exhibit 464.</p> <p>21 The second one, "FrankSpeech, Help in a Couple</p> <p>22 of Ways," I'm going to mark and introduce the video of</p> <p>23 that commercial, again the commercial available via the</p> <p>24 iSpot TV as Exhibit 465.</p> <p>25 (Whereupon, Exhibit 465 was marked.)</p>

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<p style="text-align: right;">Page 337</p> <p>1 BY MS. WRIGLEY:</p> <p>2 Q. And in the interest of time for all of us, we</p> <p>3 won't play and watch those commercials.</p> <p>4 I'm going to ask you about some information</p> <p>5 and a few documents produced in connection with your</p> <p>6 texts.</p> <p>7 MS. WRIGLEY: Can you get me Tab 45?</p> <p>8 BY MS. WRIGLEY:</p> <p>9 Q. If you put -- I'm going to have you get one of</p> <p>10 the exhibits back out in front of you. This is 456. It's</p> <p>11 the last, sort of, text message chain that we marked and</p> <p>12 looked at, and I'm going to mark and introduce an exhibit</p> <p>13 that I created from a number of attachments that were</p> <p>14 produced in connection with these text messages.</p> <p>15 These attachments were produced after the text</p> <p>16 message, but these are attachments that were sent via your</p> <p>17 texts between you and Mike Lindell, and I put a number of</p> <p>18 them together that are similar so I can ask you some</p> <p>19 questions about it.</p> <p>20 (Whereupon, Exhibit 466 was marked.)</p> <p>21 BY MS. WRIGLEY:</p> <p>22 Q. So I'm going to hand to you what's been marked</p> <p>23 as Exhibit 466. These have a variety of Bates numbers.</p> <p>24 DEF121031, 34, 35, 36, 37, 38, 39, 41, 42, 43, 46 and 47.</p> <p>25 Looking at the one that appears on, sort of,</p>	<p style="text-align: right;">Page 339</p> <p>1 revenue, tax, shipping and quantity; correct?</p> <p>2 A. Correct.</p> <p>3 Q. Okay. And then, how would you use information</p> <p>4 like this in connection with your job at MyPillow?</p> <p>5 A. I send it to Mike Lindell. I don't use it in</p> <p>6 any way.</p> <p>7 Q. Okay. And you regularly send information like</p> <p>8 this to Mr. Lindell?</p> <p>9 A. Not on a regular basis, No.</p> <p>10 Q. Okay. When do you send him information like</p> <p>11 this?</p> <p>12 A. If I see a spike.</p> <p>13 Q. Okay. And then, what is your understanding</p> <p>14 of -- well, strike this.</p> <p>15 What's the, sort of, purpose of sending spikes</p> <p>16 to Mr. Lindell?</p> <p>17 A. Then if he wants to investigate where the</p> <p>18 spike came from, he can do so.</p> <p>19 Q. Okay. And is that so then he knows -- well,</p> <p>20 strike that.</p> <p>21 Have you ever worked with him to, sort of,</p> <p>22 investigate the reason for a particular spike in sales?</p> <p>23 A. No.</p> <p>24 Q. Okay. So is it fair to say that your general</p> <p>25 practice would be to send him information from Magento on</p>
<p style="text-align: right;">Page 338</p> <p>1 the first page, do you recognize this information?</p> <p>2 A. It's our chart on Magento.</p> <p>3 Q. Okay. And where would the information that</p> <p>4 appears on the first page of Exhibit 466 have come from?</p> <p>5 A. I take a picture of it and send it to Mike.</p> <p>6 Q. Okay. You just take a screenshot of it?</p> <p>7 A. Correct.</p> <p>8 Q. And then, you put it in a text to</p> <p>9 Mike Lindell?</p> <p>10 A. Correct.</p> <p>11 Q. And then, when looking at this first one, this</p> <p>12 one comes from the Magento system?</p> <p>13 A. Correct.</p> <p>14 Q. Okay. And at the top, it has last 24 hours</p> <p>15 with a drop-down.</p> <p>16 Do you see that?</p> <p>17 A. Yes.</p> <p>18 Q. And is that the default so you can see the</p> <p>19 sales of MyPillow products for the last 24 hours?</p> <p>20 A. Correct.</p> <p>21 Q. Then, you're able to see the sales through</p> <p>22 Magento for the MyPillow products on an hourly basis;</p> <p>23 correct?</p> <p>24 A. That's correct.</p> <p>25 Q. And then, at the bottom, you get numbers for</p>	<p style="text-align: right;">Page 340</p> <p>1 sales on an hourly or daily basis whenever you see unusual</p> <p>2 or big spikes?</p> <p>3 A. Yes.</p> <p>4 Q. Okay. And would the converse be true, which</p> <p>5 is whenever you see big drops in sales?</p> <p>6 A. Yes.</p> <p>7 Q. Okay. I'm going to show you another one like</p> <p>8 this, just so I understand the information.</p> <p>9 (Whereupon, Exhibit 467 was marked.)</p> <p>10 BY MS. WRIGLEY:</p> <p>11 Q. I'm handing to you what's been marked</p> <p>12 Exhibit 467. I'll represent that this is a number of</p> <p>13 different attachments produced by defendants in connection</p> <p>14 with the text messages that you sent from Exhibit 456, and</p> <p>15 I've put a number of them together that are similar type</p> <p>16 information. For the record, the bates number for this</p> <p>17 one is 121016, 17, 21, 22, 23 and 24.</p> <p>18 Do you recognize looking at the first page of</p> <p>19 Exhibit 467, do you recognize the type of information</p> <p>20 presented here?</p> <p>21 A. Yes.</p> <p>22 Q. What is this?</p> <p>23 A. Same thing that was in the last -- just our</p> <p>24 sales.</p> <p>25 Q. And is this from the Magento system?</p>

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<p style="text-align: right;">Page 341</p> <p>1 A. Yes.</p> <p>2 Q. And does this show sales on a daily basis and</p> <p>3 sort of graph it out by hour?</p> <p>4 A. Yes.</p> <p>5 Q. And also shows revenue, tax, shipping and</p> <p>6 quantity?</p> <p>7 A. Yes.</p> <p>8 Q. And would you send information -- would you</p> <p>9 snapshot this from the system and send it to Mike on a</p> <p>10 regular basis whenever you saw either large spikes or</p> <p>11 large dips?</p> <p>12 A. Sometimes.</p> <p>13 Q. Okay. Do you ever -- in connection with your</p> <p>14 position as marketing director, do you ever look at the</p> <p>15 performance of sales on any other cadence besides what we</p> <p>16 see in the last two exhibits on a daily or an hourly</p> <p>17 basis?</p> <p>18 A. No.</p> <p>19 Q. Okay. Do you ever look at sales weekly or</p> <p>20 monthly?</p> <p>21 A. On such as this, no.</p> <p>22 Q. Okay. Are you able to pull information like</p> <p>23 this in a graph form for the performance of any</p> <p>24 promo codes?</p> <p>25 A. No.</p>	<p style="text-align: right;">Page 343</p> <p>1 Q. And I think a number of times you had</p> <p>2 remembered or acknowledged that he had mentioned</p> <p>3 Smartmatic in connection with the Absolute Proof series;</p> <p>4 correct?</p> <p>5 A. I remember the movies. I don't know if he</p> <p>6 specifically mentioned Smartmatic.</p> <p>7 Q. Do you have any knowledge of the company or</p> <p>8 entity Smartmatic, at all?</p> <p>9 A. None.</p> <p>10 Q. Okay. Have you seen, or are you aware of any</p> <p>11 evidence that Smartmatic's election technology or products</p> <p>12 were used widely in the 2020 Presidential Election?</p> <p>13 A. I don't follow that.</p> <p>14 Q. Okay. Do you have any evidence or knowledge</p> <p>15 that Smartmatic, the company, entities, Smartmatic</p> <p>16 entities are the same as the Dominion company?</p> <p>17 A. I don't have any knowledge.</p> <p>18 Q. Okay. Do you have any knowledge about whether</p> <p>19 the Smartmatic election technology or voting machines are</p> <p>20 designed to rig or not rig elections?</p> <p>21 A. No knowledge.</p> <p>22 Q. Do you have any knowledge about the</p> <p>23 Smartmatic election -- the security of the Smartmatic</p> <p>24 election technology?</p> <p>25 A. No knowledge.</p>
<p style="text-align: right;">Page 342</p> <p>1 Q. Okay. This is just total sales, overall?</p> <p>2 A. This is sales from our website.</p> <p>3 Q. From the website, okay.</p> <p>4 MS. WRIGLEY: Why don't we take a break</p> <p>5 for a few minutes. I just want to regroup and see how</p> <p>6 much time I have left. I may be close to getting done.</p> <p>7 MS. OLIVER: Okay.</p> <p>8 THE VIDEOGRAPHER: We are going off the</p> <p>9 record. The time now is 4:46 p.m.</p> <p>10 (Whereupon, a recess was taken from</p> <p>11 4:46 p.m. to 5:07 p.m.)</p> <p>12 THE VIDEOGRAPHER: We are going back on</p> <p>13 the record. The time now is 5:07 p.m.</p> <p>14 BY MS. WRIGLEY:</p> <p>15 Q. Ms. Curtis, thank you for your patience. I</p> <p>16 just have a few more questions left, and then I'll reserve</p> <p>17 any time I need to follow up after your counsel may ask</p> <p>18 you some questions.</p> <p>19 A. Okay.</p> <p>20 Q. I think, earlier, when I asked you a number of</p> <p>21 questions, I had made reference to a number of</p> <p>22 documentaries or movies prepared by Mike Lindell in the</p> <p>23 Absolute Proof series.</p> <p>24 Do you remember that, sort of, generally?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 344</p> <p>1 Q. Do you have any knowledge or evidence</p> <p>2 regarding Smartmatic doing anything to rig the 2020</p> <p>3 Presidential Election?</p> <p>4 A. None.</p> <p>5 Q. Okay. And do you hold any views on whether</p> <p>6 voting machines were used to rig or steal the election for</p> <p>7 former President Trump?</p> <p>8 A. I don't know of any.</p> <p>9 Q. Okay. And do you have any knowledge about</p> <p>10 whether Smartmatic's election technology was used in any</p> <p>11 place other than Los Angeles County in the 2020</p> <p>12 Presidential Election?</p> <p>13 A. I have No knowledge.</p> <p>14 Q. Okay. In terms of marketing strategy, have</p> <p>15 you ever had any discussions with Mike Lindell related to</p> <p>16 appearances or documentaries or public statements that</p> <p>17 he's made about election fraud in connection with the 2020</p> <p>18 Presidential Election and how that could be used or not</p> <p>19 used in connection with marketing MyPillow products?</p> <p>20 A. No.</p> <p>21 MS. OLIVER: Objection to form.</p> <p>22 BY MS. WRIGLEY:</p> <p>23 Q. Have you ever expressed any views to</p> <p>24 Mr. Lindell about the impact of any appearances, public</p> <p>25 statements or documentaries that he's done related to</p>

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<p style="text-align: right;">Page 345</p> <p>1 election fraud on the marketing of MyPillow products?</p> <p>2 A. No.</p> <p>3 Q. Okay. And typically, in terms of Mr. Lindell</p> <p>4 making requests of you in connection with your employment</p> <p>5 at MyPillow, do you, sort of, generally comply or do the</p> <p>6 things that he asks you to do?</p> <p>7 A. Yes.</p> <p>8 Q. Okay. Are there any occasions in 2020, 2021,</p> <p>9 2022, 2023 where, in connection with your job in marketing</p> <p>10 at MyPillow, you've made a decision not to do the things</p> <p>11 he's asked you to do?</p> <p>12 A. No.</p> <p>13 Q. Okay. Ms. Curtis, thank you -- thank you very</p> <p>14 much for your time and your patience today. I know we</p> <p>15 went through quite a few documents. So I appreciate it.</p> <p>16 Again, I haven't any further questions at this</p> <p>17 time, and I'll just reserve any time I have remaining to</p> <p>18 follow up in case I need to after your counsel asks you a</p> <p>19 few things.</p> <p>20 A. Thank you.</p> <p>21 EXAMINATION</p> <p>22 BY MS. OLIVER:</p> <p>23 Q. You answered a lot of questions today about</p> <p>24 MyPillow's relationship or non-relationship with</p> <p>25 Mike Lindell's political activities today; right?</p>	<p style="text-align: right;">Page 347</p> <p>1 CERTIFICATE</p> <p>2 I, Barbara J. Carey, Registered Professional</p> <p>3 Reporter and Certified Shorthand Reporter, do hereby</p> <p>4 certify that prior to the commencement of the examination,</p> <p>5 Dawn H. Curtis was duly remotely sworn by me to testify to</p> <p>6 the truth, the whole truth and nothing but the truth.</p> <p>7 I DO FURTHER CERTIFY that the foregoing is a</p> <p>8 verbatim transcript of the testimony as taken</p> <p>9 stenographically by me at the time, place and on the date</p> <p>10 hereinbefore set forth, to the best of my ability.</p> <p>11 I DO FURTHER CERTIFY that I am neither a</p> <p>12 relative nor employee nor attorney nor counsel of any of</p> <p>13 the parties to this action, and that I am neither a</p> <p>14 relative nor employee of such attorney or counsel, and</p> <p>15 that I am not financially interested in the action.</p> <p>16</p> <p>17</p> <p>18</p> <p>19 _____</p> <p>20 BARBARA J. CAREY</p> <p>21 Registered Professional Reporter</p> <p>22 Certified Shorthand Reporter</p> <p>23 Notary Public</p> <p>24 Dated: September 14, 2023</p> <p>25</p>
<p style="text-align: right;">Page 346</p> <p>1 MS. WRIGLEY: Object to form.</p> <p>2 A. Yes.</p> <p>3 BY MS. OLIVER:</p> <p>4 Q. As the VP of media relations, what is your</p> <p>5 view of the relationship between MyPillow and</p> <p>6 Mike Lindell's political activities?</p> <p>7 A. I believe they're separate. MyPillow is</p> <p>8 completely separate from Mike Lindell, the advertising</p> <p>9 part.</p> <p>10 MS. OLIVER: I don't have any other</p> <p>11 questions.</p> <p>12 MS. WRIGLEY: I don't have anything</p> <p>13 further.</p> <p>14 Thank you.</p> <p>15 THE VIDEOGRAPHER: We are going off the</p> <p>16 record. The time now is 5:12 p.m., and this concludes</p> <p>17 today's testimony given by Dawn H. Curtis.</p> <p>18 THE REPORTER: And, Ms. Oliver, what is</p> <p>19 your transcript order? Would you like a rough?</p> <p>20 MS. OLIVER: I would like a rough, thank</p> <p>21 you. And I'll take a full, as well.</p> <p>22 (The video deposition of Dawn H. Curtis</p> <p>23 concluded at approximately 5:12 p.m.)</p> <p>24 * * * * *</p> <p>25</p>	<p style="text-align: right;">Page 348</p> <p>1 DEPOSITION ERRATA SHEET</p> <p>2</p> <p>3</p> <p>4 Our Assignment No. J10261228</p> <p>5 Case Caption: SMARTMATIC USA CORP., et al.</p> <p>6 vs. MICHAEL J. LINDELL, et al.</p> <p>7</p> <p>8 DECLARATION UNDER PENALTY OF PERJURY</p> <p>9 I declare under penalty of perjury</p> <p>10 that I have read the entire transcript of</p> <p>11 my Deposition taken in the captioned matter</p> <p>12 or the same has been read to me, and</p> <p>13 the same is true and accurate, save and</p> <p>14 except for changes and/or corrections, if</p> <p>15 any, as indicated by me on the DEPOSITION</p> <p>16 ERRATA SHEET hereof, with the understanding</p> <p>17 that I offer these changes as if still under</p> <p>18 oath.</p> <p>19 Signed on the _____ day of</p> <p>20 _____, 2023.</p> <p>21</p> <p>22 _____</p> <p>23 DAWN H. CURTIS</p> <p>24</p> <p>25</p>

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<p>1 DEPOSITION ERRATA SHEET</p> <p>2 Page No. _____ Line No. _____ Change to: _____</p> <p>3 _____</p> <p>4 Reason for change: _____</p> <p>5 Page No. _____ Line No. _____ Change to: _____</p> <p>6 _____</p> <p>7 Reason for change: _____</p> <p>8 Page No. _____ Line No. _____ Change to: _____</p> <p>9 _____</p> <p>10 Reason for change: _____</p> <p>11 Page No. _____ Line No. _____ Change to: _____</p> <p>12 _____</p> <p>13 Reason for change: _____</p> <p>14 Page No. _____ Line No. _____ Change to: _____</p> <p>15 _____</p> <p>16 Reason for change: _____</p> <p>17 Page No. _____ Line No. _____ Change to: _____</p> <p>18 _____</p> <p>19 Reason for change: _____</p> <p>20 Page No. _____ Line No. _____ Change to: _____</p> <p>21 _____</p> <p>22 Reason for change: _____</p> <p>23 _____</p> <p>24 SIGNATURE: _____ DATE: _____</p> <p>25 DAWN H. CURTIS</p>	Page 350